Pillar 3 Disclosure

Update as at
31 December 2014

MONTE DEI PASCHI DI SIENA
BANK SINCE 1472

Pillar 3 Disclosure

Update as at
31 December 2014

Banca Monte dei Paschi di Siena SpA
Company Head Office in Siena, Piazza Salimbeni 3, www.mps.it
Recorded in the Siena Company Register – Registration no. and tax code 00884060526
Member of the Italian Interbank Deposit Protection Fund. Bank Register no. 5274
Parent Company of the Monte dei Paschi di Siena Banking Group, registered with the Banking Groups Register

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Introduction

The New Regulations for the Prudential Supervision of banks and banking groups entered into force as of 1 January 2014.

The regulations aim to align national requirements with the changes introduced to the International regulatory framework, particularly the European Union's New Regulatory and Institutional Framework for Banking Supervision.

The new regulatory package, commonly known as the "Basel 3 framework" is governed by the:

✓ CRR – Capital Requirements Regulation (EU) 575/2013 of the European Parliament and Council of 26 June 2013 regarding prudential requirements for credit institutions and investment firms, which amends Regulation (EU) 648/2012;

✓ CRD IV – Capital Requirements of the European Parliament and Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC.

The regulatory package includes application criteria, set out in the Regulatory Technical Standards (RTS) and Implementing Technical Standards (ITS) adopted by the European Commission, upon the proposal of the European Supervisory Authorities.

At national level, the new harmonized framework has been implemented by Bank of Italy with:

✓ Circular 285 of 17 December 2013 – Supervisory Provisions for Banks;

✓ Circular 286 of 17 December 2013 – Instructions for Prudential reporting for banks and securities' firm;

✓ Circular 154 of 22 November 1991 – 56th Update, 20 January 2015 – Supervisory reports of banks and financial institutions. Reporting templates and instructions for transmission of information flows.

The new regulatory framework aims to improve the ability of banks to absorb shocks arising from financial and economic stress, whatever the source, improve risk management and governance and strengthen the bank's transparency and disclosures, while taking into account developments from the financial crisis.

The Basel Committee has maintained a three Pillars-based approach which was at the basis of the previous capital accord known as "Basel 2", but has integrated and strengthened it to increase the quantity and quality of banks' capital base and introduce countercyclical supervisory tools as well as new standards for liquidity risk management and financial deleveraging.

More specifically, Pillar 3 was designed on the notion that Market Discipline can be harnessed to reinforce capital regulation to promote stability and soundness in banks and financial systems.

Pillar 3, therefore, aims to complement the minimum capital requirements (Pillar 1) and supervisory review process (Pillar 2) by developing a set of transparent disclosure requirements which will allow market participants to have access to key, fully comprehensive and reliable information on capital adequacy, risk exposures and risk identification, measurement and management processes.

Public Disclosure (Pillar3) is now governed directly by European Regulation no. 575/2013 of 26 June 2013 of the European Parliament and Council, Part 8 and Part 10, Title I, Chapter 3 (hereinafter referred to as “The Regulations” or “CRR”).

The previous Regulations (Bank of Italy Circular 263/06, Paragraph IV) along with the reporting templates and rules provided therein are to be considered no longer applicable.

Under the new regulations, the CRR requires banks to publish information at least on an annual basis along with their financial statements and to evaluate the need to publish some or all disclosures more frequently than once a year depending on their specific activities.

The EBA Guidelines (EBA / GL / 2014/14) of 23 December 2014 on the frequency of Pillar3 publication, set the minimum requirement for institutions to disclose information on an annual basis, in conjunction with the publication of the financial statements. Beyond this, in accordance with Article 106 of the CRD IV, each National Competent Authority may impose more frequent disclosure than that provided in the CRR within their own jurisdiction, requiring each bank to assess the need to publish disclosures more frequently.

The current update introduces the new information templates required by the Basel 3 framework and reports pro-forma values as at 31 December 2014, restated solely for comparative purposes.

Information must be both qualitative and quantitative in nature and be structured so as to provide a comprehensive overview of the risks assumed, the features of the management and control system and the capital adequacy of the Montepaschi Group.

Pillar 3 Disclosure is prepared at consolidated level by the Parent Company.

Unless otherwise indicated, all the amounts in this report are stated in TEUR (thousand Euros).

As an aid to understanding and clarifying certain terms and abbreviations used in this report, please refer to the Glossary provided at the end of the document.

Given the public relevance of this disclosure, the document is submitted by the Manager responsible for preparing the financial reports to the corporate bodies competent for approval. This document is therefore subject to the related attestation, pursuant to art. 154-bis of Legislative Decree no. 58/98 (Consolidated Law on Finance, “TUF”).

The Montepaschi Group regularly publishes its Pillar 3 disclosure on its website at: http://english.mps.it/Investor+Relations

Further information on the Group's risk profile of the Group, under art. 434 of the CRR, is also published in the Annual Report as at 31 December 2014, in the Corporate Governance Report and in the Remuneration Report. Under art. 434, if a similar piece of information is disclosed in two or more media, a reference to the synonymous information in the other media shall be included within each medium. As a consequence, the information provided by the Group contains the appropriate cross-reference.

1. Risk management objectives and policies

Executive Summary

Key Regulatory Metrics

Common Equity Tier 1	Tier 1	Own Funds
€ 6.6 mld *down -24%* *Dec-13: € 8.8 mld*	€ 6.6 mld *down -24%* *Dec-13: € 8.8 mld*	€ 9.9 mld *down -19%* *Dec-13: € 12.3 mld*
CET 1 Ratio	Tier 1 Ratio	Total Capital Ratio
8.7% *Dec-13: 10.5%*	8.7% *Dec-13: 10.5%*	13.0% *Dec-13: 14.7%*
Total RWA	EAD Rischio di Credito	
€ 76.2 mld *down -9%* *Dec-13: € 83.7 mld*	€ 197.8 mld *down -4%* *Dec-13: € 205.9 mld*	

The core objective of this disclosure is to provide a comprehensive description of the Montepaschi Group's risk profile as well as information on capital management and underlying risk drivers in addition to that already contained in the Annual Financial Report.

The annual disclosure provides detailed information on the Montepaschi Group's capital adequacy (under Pillar I) and on the assessment of risk using Risk Management models. The Group manages its capital by ensuring that the capital base and correlated ratios are consistent with the risk profile assumed and compliant with regulatory requirements. The assessment of regulatory capital adequacy is based on the constant monitoring of own funds and risk weighted assets (RWAs) as well as on a comparison with the minimum regulatory requirements. RWA and asset optimisation is achieved through the simultaneous monitoring the trend in volumes and changes in related risk metrics. The Group believes increasingly crucial oversee the evolution of the credit quality of the portfolio in the macroeconomic scenario.

Disclosure as at 31 December 2014 has been prepared on the basis of the new regulatory and institutional framework of the European Union's banking supervision (Basel 3), which defines more stringent rules for the capital adequacy levels of banks.

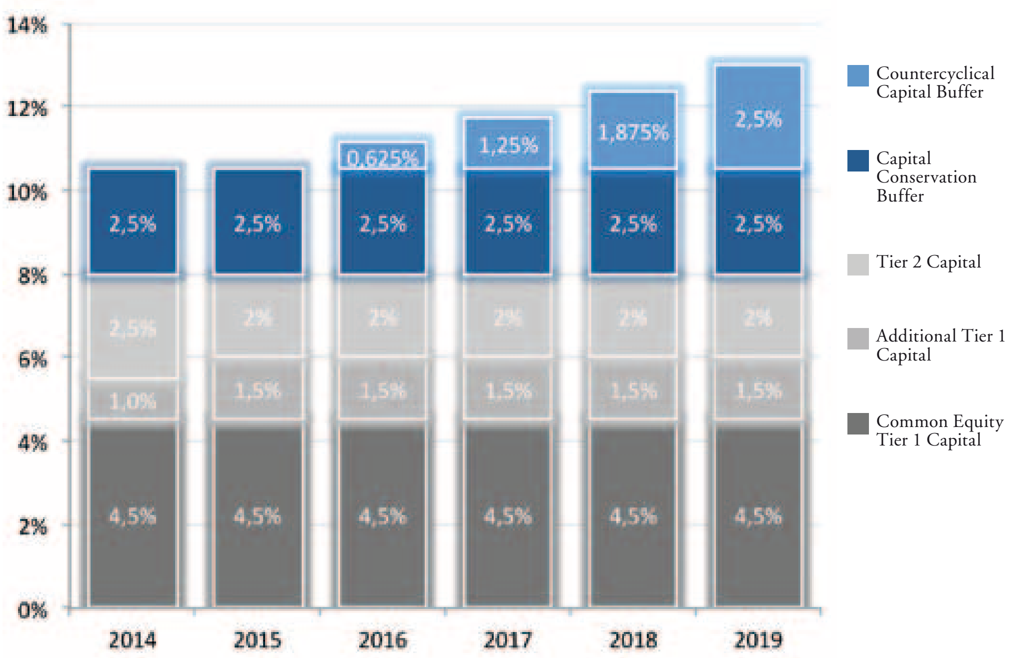
The introduction of Basel 3 regulations is subject to a transition period that extends the full application of the rules to 2019 (2022 for the phase-out of certain capital instruments) and during which the new rules will be applied in an increasing proportion. In particular, there are several elements that will be eligible for full inclusion or deduction from common equity when the framework is fully effective, but currently only have a partial percentage effect on Common

Equity; generally, the residual percentage, after the applicable portion, is included in/deducted from Additional Tier 1 Capital (AT1) or Tier 2 capital (T2), or is factored into risk-weighted assets.

Specific transitional provisions have also been established for subordinated instruments that do not meet the requirements envisaged in the new regulatory provisions, aimed at the gradual exclusion of instruments no longer regarded as eligible from Own Funds (over a period of 8 years).

Accordingly, the prudential ratios as at 31 December 2014 take account of the adjustments envisaged by the transitional provisions for 2014. Below is a summary of the minimum regulatory requirements envisaged by the Basel 3/CRR framework.

Evolution of the minimum regulatory requirements envisaged by the Basel 3 / CRR framework



Under Prudential requirements, as of January 2014 all banks must comply with a CET1 ratio of at least 4.5%, a Tier 1 ratio of at least 5.5% (a6% as of 2015) and a Total capital Ratio of at least 8%. Additionally, Banks are also required to have the following buffers: as of 1 January 2014, a *capital conservation buffer of* 2.5% (to be added to the CET1 requirement); as of 2016, a specific *countercyclical capital buffer* for phases of excessive growth in loans and a *G-SII* capital buffer (1% – 3.5%; as of 2016) and a *O-SII* capital buffer (0% – 2 as of 2016). The failure to comply with these combined capital requirements results in a restriction being imposed on the distribution of dividends as well as the need to adopt a capital conservation plan. The table below summarises the capital requirements for the MPS Group.

Executive Summary on Own Funds and Capital Requirements

Data in thousands of euros

Own Funds	dec-14	dec-13*	Delta vs. 31-12-2013 Absolute	%
Common Equity Tier 1 (CET1)	6,607,509	8,751,614	-2,144,105	-24.5%
Additional Tier 1 Capital (AT1)	-	-	-	-
Tier 2 Capital (T2)	3,292,608	3,527,844	-235,236	-6.7%
Own Funds	**9,900,117**	**12,279,458**	**-2,379,341**	**-19.4%**
↳ *of which Delta PA*	*174,843*	*-1,288,730*	*1,463,573*	*-113.6%*
Capital Requirements				
Credit and Counterparty Risk	5,001,640	5,442,612	-440,972	-8.1%
↳ *of which Standardised Approach*	*2,670,400*	*2,975,116*	*-304,716*	*-10.2%*
↳ *of which Airb Approach*	*2,331,240*	*2,467,496*	*-136,256*	*-5.5%*
Market Rsik	289,142	504,621	-215,479	-42.7%
↳ *of which Standardised Approach*	*286,106*	*504,621*	*-218,515*	*-43.3%*
↳ *of which Airb Approach*	-		-	-
↳ *of which Concentration Risk*	*3,036*		*3,036*	-
Operational Risk	708,267	659,407	48,860	7.4%
↳ *of which Foundation Approach*	*20,212*	*29,343*	*-9,131*	*-31.1%*
↳ *of which Advanced Approach*	*688,055*	*630,064*	*57,991*	*9.2%*
CVA Risk	98,579	93,313	5,266	5.6%
Regulatory Capital Requirements	**6,097,628**	**6,699,953**	**-602,325**	**-9.0%**
Risk-weighted assets	**76,220,350**	**83,749,413**	**-7,529,063**	**-9.0%**

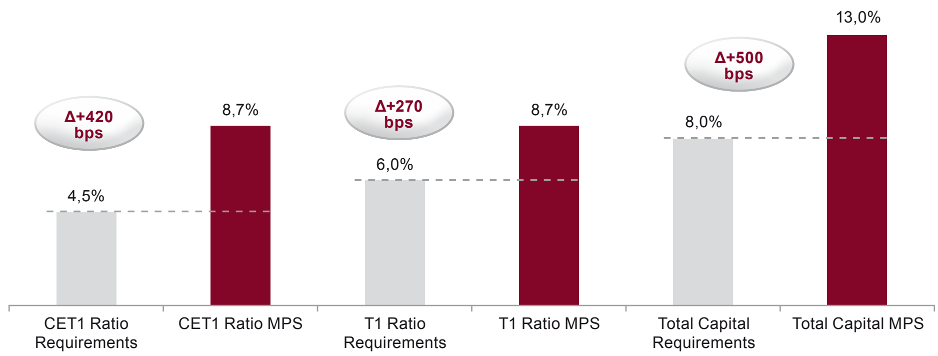
Capital Ratio	dec-14	dec-13*	Delta vs. 31-12-2013 Absolute	%
CET1 Capital Ratio	**8.7%**	**10.5%**	**-178**	**-1.8%**
Tier 1 Ratio	**8.7%**	**10.5%**	**-178**	**-1.8%**
Total Capital Ratio	**13.0%**	**14.7%**	**-167**	**-1.7%**

** Recalculated Data for comparative purposes only*

*** The sign of the delta PA is represented, as a positive element or element to be deducted based on the contribution to the determination of the Own Funds. In 2014, the Montepaschi Group shows a surplus of value adjustments to loans compared to expected losses and therefore constitutes a positive element of the Tier2 computable within the limits of 0.6% of RWA due to the method Airb. The positive amount calculable in T2 for 2014 amounts to 174,843 €/ thousand and the aggregate amount of the delta PA amounts to -981,903 €/ thousand.*

As at 31 December 2014, the MPS Group showed an adequate level of capitalisation to cover the minimum requirements for Own Funds established by the Basel 3 framework, with a total capital surplus of EUR 3.2bn compared to the minimum CET1 and of EUR 3.8bn compared to the minimum level of Total Capital required. Therefore, although capital ratios were down against the previous year, they remain above minimum regulatory requirements, as shown in the graph below.

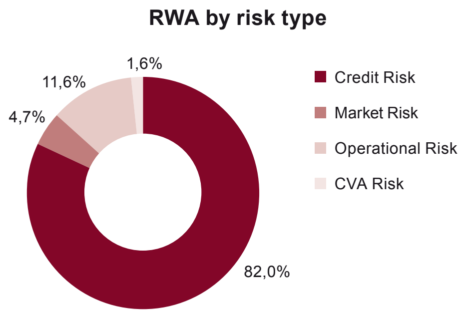
Capital Adeguacy



The decrease of EUR 2.4bn in Own Funds compared to December 2013 (Basel 3 pro-forma values) is largely due to the loss registered for the year, the repayment of EUR 3bn of Monti Bonds and the impact resulting from the AFS Reserve on Italian government bonds relating to the "Alexandria" trade, only partially offset by the rights issue of EUR 5bn completed last June and the elimination of the Expected Loss Delta. The loss registered was mainly due to the accounting of loan coverage adjustments identified during the AQR, which also led to the elimination of the Expected Loss Delta in Expected Losses since the adjustment of coverage on the loan portfolio more than offset the corresponding level of expected loss.

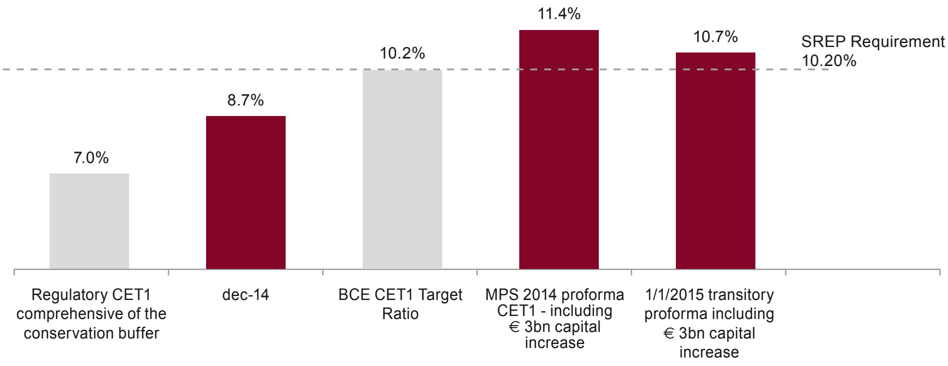
RWAs for credit risk decreased by approximately 8.1% from December 2013. Specifically, absorption of credit risk declined due to the reduction of performing loans, also as a result of reclassifications made during the AQR, as did market risk due to portfolio optimisation and the decrease in operating levels, while DTAs transformable into credits increased as a result of greater provisions recognised in the financial statements for the AQR.

A breakdown of RWAs by type of risk shows a large concentration in Credit Risk (82.1%) notwithstanding the overall year-on-year decrease of 9.0% in absolute terms.



Regarding the assessment of capital adequacy, the results of the Comprehensive Assessment published by the EBC on 26 October 2014 revealed a capital shortfall for the MPS Group of EUR 2.1bn. The Bank is required to cover the shortfall within 9 months subsequent to 26 October 2014 and, subsequently, to reach and comply with Total Capital and Common Equity Tier 1 target ratios of 10.9%and 10.2% respectively. The ratios established by the EBC must be complied with for as long as the Authority's Decision is applicable. In order to have a capital buffer with respect to the CET1 threshold required under the SREP (10.2%), the Bank's Board of Directors resolved to submit to the Shareholders' meeting a proposal to increase the rights issue already announced following publication of the AQR results, from EUR 2.5bn to a maximum of EUR 3bn. The rights issue proposed has been entirely backed by a pre-underwriting agreement entered into with global investment banks who have committed to guaranteeing – subject to the terms and conditions that are typical of such transactions – the subcription of any newly issued ordinary shares remaining unsubscribed, for up to a maximum of EUR 3bn. Considering, therefore, the already-announced rights issue, the MPS Group's CET1, as illustrated in the graph below, would be 11.4% vs- the 10.2% required by the ECB and 10.7% as at 1 January 2015 (taking account of Phase-in), which are still above the new regulatory threshold.

CET 1 Ratio e BCE CET 1 Target

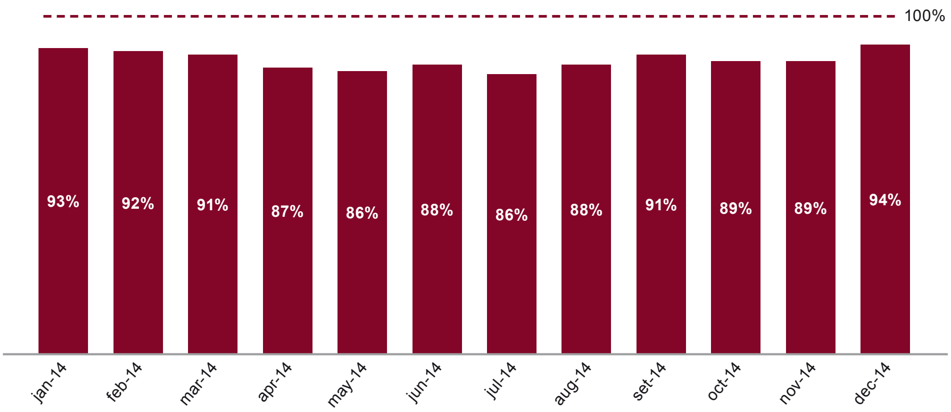


** Transitional ratio, pro-forma including € 3 bn capital increase and the payment of NFIs coupon through the issue of new shares*

During the yearly planning of the Risk Budget, the BoD established the internal risk appetite limits. These internal operating limits are monitored monthly in terms of diversified Economic Capital, on the basis of calculation and reporting systems developed by Risk Management. The Group's risk profile in 2014 remained consistently within the Risk Appetite annual budget, as illustrated in the graph below:

Montepaschi Group: Operational Economic Capital

Consumption % of 2014 Risk Appetite Budget 2014



1.1 Risk Governance in the Montepaschi Group

The Group attaches the utmost importance to the process of identifying, monitoring, measuring, controlling and mitigating risks.

Risk governance strategies are implemented in line with the Group's business model, Business Plan medium-term objectives and legal and regulatory requirements.

Policies relating to the assumption, management, coverage, monitoring and control of risk are established by the Board of Directors of the Parent Company. In particular, the BoD regularly defines and approves the strategic risk governance guidelines and establishes the total risk appetite of the entire Group in line with the annual Budget.

The Montepaschi has defined a new comprehensive framework of reference for determining risk appetite: the Risk Appetite Framework (RAF). The objective of the RAF is to ensure constant alignment between the Group's actual risk profile and the risk appetite defined by the Board of Directors, taking into account pre-established risk tolerance levels and in any event within the maximum admissible limits (risk capacity) deriving from regulatory requirements or other restrictions imposed by the Supervisory Authorities.

The RAF incorporates the Group's main strategic references:

- Pillar 1 and 2 capital adequacy and consistency with the ICAAP process;
- short- and long-term liquidity profile and level of financial leverage;
- reputation, positioning and external context;
- Risk-adjusted performance.

It is implemented by establishing operating limits for the various business areas, adequate governance policies and robust processes for the management of the various corporate risks.

For a more thorough account of the Group's corporate governance structure and detailed information pursuant to Art. 435 paragraph 2 of the CRR, please refer to the Corporate Governance Report available on the Group's website at (www.mps.it/Investor+Relations/Corporate+Governance).

In 2014, the entire RAF was redesigned in compliance with the new regulatory provisions introduced in the 15th update of 2 July 2013 of Bank of Italy Circular 263/06 concerning internal control systems.

As a result, numerous internal policies and rules were also updated/issued with a view to establishing and promoting a stronger and more widespread risk culture at all levels of the organisation. The awareness of risk and the correct knowledge and application of internal risk monitoring models – especially those which have been validated for regulatory purposes – are fundamental prerequisites for effective, sound and prudent business management.

To further promote awareness of behaviours on the part of all resources and support the risk culture growth process, risk and risk-adjusted performance indicators have been incorporated into staff remuneration and incentive policies.

The Montepaschi Group is one of the Italian banks subject to the ECB's Single Supervisory Mechanism.

1.2 Internal Control System and Risk Management Process

The general framework of controls within the Group is internally regulated by the Internal Controls System Policy, which defines a set of rules, functions, structures, resources, processes and procedures to ensure the sound and prudent management of the company.

The **Internal Controls System** plays a crucial role within the organisation in that it:

- constitutes a key source of knowledge for the Corporate Bodies to ensure full situational awareness and effective Corporate risk management;
- directs the changes in strategic guidelines and company policies and ensures the consistent alignment of the organisational framework;
- monitors the efficiency of operational systems and compliance with prudential supervisions requirements;
- it promotes a culture of risk awareness, compliance with the law and the respect of corporate values.

Consequently, the Internal Controls System plays a strategic role for the Group and the issue of controls assumes an important position within the framework of corporate values, involving all levels of the organisation (governing bodies, business units/structures, hierarchical levels, staff) in developing and applying the logical and systematic methods for identifying, measuring, disclosing and managing risk.

The **risk management process** is designed to identify and correctly map all current and future risks that the Montepaschi Group incurs or may incur, model and meaure these risks, ensure an effective level of controls as well as an adequate flow of operational and management reporting, support the implementation of proper risk mitigation and management actions.

The fundamental principles of the Montepaschi Group's risk management process are based on a clear-cut distinction of the roles and responsibilities of the different functions at first, second and third-levels of control and include the Business Functions.

The Board of Directors of the Parent company is responsible for defining and approving strategic guidelines and risk management policies and, at least once a year, quantitatively expresses the Group's overall risk appetite in terms of Economic capital.

The Board of Statutory auditors and the

Control and Risk Committee are responsible for evaluating the level of efficiency and adequacy of the internal control Systems with particular regard to risk control.

The CEO/General Management is responsible for ensuring compliance with risk policies and procedures.

The Director in charge of the internal control and risk management system, appointed in compliance with the Corporate Governance Code for listed companies, is responsible for creating and maintaining an effective system of internal control and risk management.

Specific management committees responsible for risk issues have been established in order to promote efficiency and flexibility in the decision-making process and facilitate interactions between the various corporate departments involved:

- The Risk Committee establishes risk management policies and ensures overall compliance with the limits defined for the various operating levels. It is responsible for assessing initiatives for capital allocation and submitting them to the Board of Directors as well as assessing risk profile and, therefore, capital consumption (Regulatory and Economic) at both Group level and individual Group company level. The Risk Committee also analyses the risk-return performance indicators;
- The Finance and liquidity committee of the Parent company has the task of setting the principles and providing strategic guidance for Proprietary Finance. Furthermore, it deliberates and submits proposals concerning the interest rate and liquidity risk exposure of the banking book and defines capital management actions required;
- The Credit, Credit Policies and Credit Assessment Committee formulates credit process guidelines and expresses an opinion, at least once a year, on credit policies by verifying their commercial sustainability and consistency with risk appetite levels. At least once a year, it approves company policies pertaining to credit assessment, including for the purpose of subsequent reporting in the financial statements.

Five permanent and independent Corporate Control Functions (CCFs) have been set up within the Internal Controls System:

- Compliance;
- Risk Management;
- Internal Validation;
- Anti-Money Laundering;
- Internal Audit.

To ensure the proper implementation of activities carried out by the Corporate Control Functions (CCFs), the Montepaschi Group has identified the following basic requirements to be complied with by each CCF:

- Appointment and Dismissal of the Head of each CCF by the corporate governing bodies;
- Independence and authority: the Heads of the CCFs are placed in appropriate hierarchical, functional positions. They have no direct responsibility for the operating areas subject to control, nor

are they hierarchically subordinate to the Heads of these areas;

- Separation of duties: the impartiality and independence of the various CCFs are ensured by their organizational segregation;
- Resources: the CCFs have the authority, resources (including financial resources, which may be independently managed with period reporting to the Corporate bodies) and skills required to perform their duties;
- Remuneration: In order not to compromise the impartiality and independence of the Heads of the CCFs, their remuneration is decided on by the corporate governing bodies by way of a specific incentive system that differs from the one established for the other corporate functions. The incentive system is based on duty-related objectives and not on the achievement of corporate targets. As part of the internal control system, third-level controls are carried out by the Internal Audit Area, second-level controls by the Risk Management Division and first-level controls by the Business Control Units (BCUs).

The Internal Audit Area, which reports directly to the BoD, performs an independent and objective "assurance" and advising activity, aimed both at monitoring operations compliance and risk trends (including through on-site audits) as well as assessing the efficiency of the overall internal control system in order to improve the effectiveness and efficiency of the organisation.

The **Risk Division**, which reports directly to the CEO, includes a risk management department, a compliance department, an anti-money laundering department and an internal validation department. This Division therefore has the following tasks:

- guarantee the overall functioning of the risk management system;
- verify capital adequacy;
- contribute to determining risk appetite;
- ensure that significant transactions are consistent with the RAF;
- define strategic policies for the loan portfolio;
- perform the internal validation duties;
- perform the compliance duties;
- perform the anti-money laundering duties required by Law;
- ensures the necessary reporting flows to the Group's Corporate Bodies and Top Management.

Outer **Business Control Units (BCU)**, which are internal to the Group subsidiaries or the main business areas of the Parent company, carry out conformity checks on transactions and are the first level of organisational supervision of operations within the more general system of internal controls.

1.3 Principal Covered Risk Factors and Internal Models for regulatory purposes

The main types of risk incurred by the Montepaschi Group in its day-to-day operations can schematically be presented as follows:

- credit risk,
- counterparty risk,
- issuer risk,
- Trading Book market risk (interest rate, price and foreign exchange) ;
- Banking Book market risk (Asset & Liability Management -ALM),
- liquidity risk,
- equity investments risk,
- UCITS risk (alternative funds),
- operational risk,
- business risk,
- real-estate risk,
- reputational risk.

Each risk factor corresponds to a model that has been developed and is used internally for operational purposes. Where the risk factor is quantifiable, this contributes to the determination and measurement of overall Economic Capital. For an account of strategies, processes and management models for the various risks and Economic Capital, please refer to the paragraphs below.

From a regulatory standpoint, in accordance with the principles contained in the New accord on capital adequacy (Basel 2) in relation to First Pillar risks, in the first half of 2008, the Montepaschi Group completed its work on the internal models for credit and operational risks. Pursuant to circular letter 263/2006 of the bank of Italy, on 12 June 2008 the Montepaschi Group was officially authorised under regulation no. 647555 to use the advanced models for the measurement and management of credit risk (AIRB - Advanced Internal Rating Based) and operational risk (AMA – Advanced Measurement Approach) as of the first consolidated report at 30-06-2008. Over time, these models have been further developed and their scope of application extended to Group entities not originally included in the initial scope of validation. As at 31-12-2014, the following portfolios/entities of the Montepaschi Group had been validated for regulatory purposes:

Credit Risk

Legal Entity	Corporate AIRB (PD, LGD)	Retail AIRB (PD, LGD)
Banca MPS	✓	✓
MPS CS	✓	✓
MPS L&F	✓	✓

The Group has adopted the standard approach for the remaining credit risk exposures/entities for regulatory purposes.

Operation Risk

Legal Entity	Metodo AMA	Metodo BIA
Banca MPS	✓	-
MPS CS	✓	-
MPS L&F	✓	-
Consum.it	✓	-
COGMPS	✓	-
Altre Entity	-	✓

The Group has adopted the standard approach to calculate capital requirements relative to market risk. Instead, capital requirements relating to counterparty risk are calculated using the current market value for OTC derivatives and long settlement transactions (LST) as well as the comprehensive method for securities financing transactions (SFT).

Methodologies and applications continued to be analysed in 2014, as required by the new international Regulatory Framework ("Basel 3"), with a particular focus on liquidity management and the related adjustment of reporting databases.

Risk inherent in investment products/ services for the Group's customers were also monitored with a view to protecting the customer and preventing any potential reputational repercussions. Pursuant to Consob Resolution no. 17297 of 28 April 2010, regular reports are prepared on the management of risk relating to the delivery of investment services. The reports are subject to approval by the Risk and Control Committee and the Board of Directors, before being sent to the Regulator.

1.4 Organization of the Risk Management Function

In the course of 2014, the Risk Division was subject to significant organisational changes aimed at strengthening its role, powers and headcount and streamlining its structure, in line with the growing importance of risk management and control within the Monte-paschi Group.

As at 31 December 2014, the Risk Division was organised into the following structures:

- Risk Management Area,
- Risk Reporting and Validation Area,
- Compliance Area,
- Anti-Money Laundering Area,
- Risk Division support staff.

As it currently stands, the Risk Division includes all second-level Corporate Control Functions, as defined by Supervisory Regulations (see Bank of Italy Circular no. 263/06, 15th update of 2 July 2013) regarding the Internal Controls System.

Autonomy and independence are ensured through relational mechanisms and functional connections with the Corporate Bodies having duties of strategic supervision, management and control.

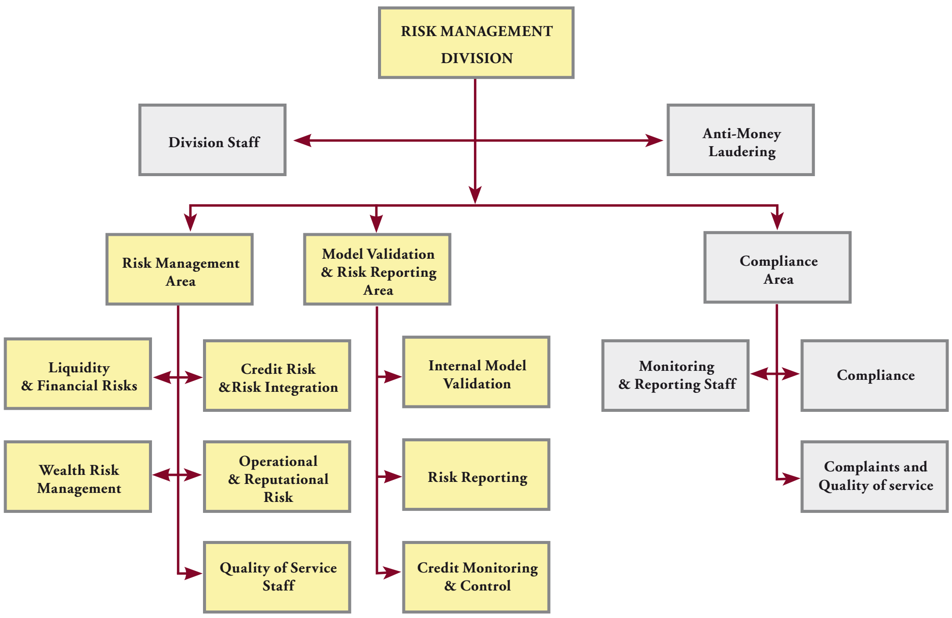
In particular, the Head of the Risk Division of the Parent Company is appointed/removed by the BoD, on the advice of the Risk and Controls Committee, with the support of the Appointments and Remuneration Committee, and having obtained the opinion of the Board of Statutory Auditors.

The remuneration of the Head of the Risk Division of the Parent Company is determined by the BoD, on the proposal of the Appointments and Remuneration Committee, having heard the opinion of the Risk and Controls Committee and having consulted with the Board of Statutory Auditors.

In addition to being the Head of the Risk Management Function, the Head of the Risk Division oversees the coordination of all the second-level Corporate Control Functions with a view to optimising the flow of information between the Functions, supporting the planning of control activities and facilitating the implementation of remedial actions.

Regarding the Compliance Function, both its internal organisational structure and its hierarchical reporting framework will undergo changes, in accordance with Bank of Italy requirements for Internal Control Systems.

In this document, the Risk Division structures relevant for the identification of the **Risk Management Function** and **Internal Validation Function** are represented by the Head of the Risk Division, the Risk Management Area structures and the Validation, Monitoring and Risk Reporting Area.



Risk Management & Internal Validation FunctionsCredit

The Parent Company's **Risk Management Area** (hereinafter RMA) oversees and monitors overall risk for the Montepaschi Group. The Risk Management Area develops and implements the operational and regulatory systems for the measurement of both proprietary risk and customer-related risks, assessing compliance with and adequacy of mitigation measures. The Area also oversees the development of internal and regulatory risk measurement models and systems in order to determine working capital and regulatory capital requirements, based on the existing regulatory options.

The Risk Management Area also oversees criteria for verification of MiFID compliance for investment products and services offered to customers, as well as those for risk and performance measurement and monitoring of products and portfolios held by customers.

As at 31 December 2014, the Risk Management Area was structured into the following segments:

- Credit Risk and Risk Integration Service;
- Liquidity and Financial Risk;
- Operational and Reputational Risk;
- Wealth Risk Management Service;
- Risk Management Quality Monitoring staff, whose duty it is to support the Area Head in cross-divisional activities.

Credit Risk and Risk Integration has the task of:

- defining, developing and updating models (PD, LGD, EAD, Maturity and haircuts) for the measurement of credit risk, by monitoring the internal model in compliance with qualitative and quantitative requirements provided for by the Supervisory authorities;
- monitoring Credit VaR measurements for each individual business unit and at Group level;
- quantifying the effects of expected and unexpected loss on credit risk and therefore on absorbed economic capital of the Group portfolio and of the individual business units and proposing corrective actions, considering the effects of mitigation actions;
- defining, developing and updating the methodologies underlying the various internal management models inherent in the Group's counterparty risk profile;
- overseeing and validating the production of counterparty risk measures at the level of individual business units, Group companies and at Group-wide level;
- defining, developing and updating the internal model of exposure to counterparty risk, in accordance with the qualitative and quantitative requirements set by the Supervisory Board;
- determining the internal capital measure used to calculate risk-adjusted performance measures;
- defining the strategic guidelines for the loan portfolio and direct the Group's lending activities;
- overseeing the calculation of collective loan impairments for subsequent recognition in the Balance Sheet;
- participating in the process to define the Group's overall Risk Appetite;
- developing and maintaining the

methodologies used for identifying and mapping the Group's significant and non-significant risks, both by individual business units and legal entities, for the purpose of risk integration and support to the ICAAP process;

- measuring risks for the Group and individual business units;
- defining, developing and updating the risk integration models used to quantify the overall Economic capital;
- developing and implementing, from an operational point of view, Pillar 2 stress and scenario testing methodologies, supporting and coordinating forecast scenario methodologies for the ICAAP process;
- measuring the overall economic capital allocated to -and absorbed by- individual legal entities, business units and the Group (current, prospective and under stress conditions);
- reconciling economic and regulatory capital requirements for the pertinent individual risks;
- assessing the risk components of products during the design phase of new product development;
- assessing the appropriateness of risk adjusted
- industrial pricing, singling out the main risk components of products for the company.

Liquidity and Financial Risks has the task of:

- defining, developing and updating the methodologies underlying the various internal management models inherent in the Group's market and counterparty risk profile;
- monitoring and validating the production of market risk measurements for each business unit, Group company and for the Group as a whole;
- defining the structure of operating limits for market and counterparty risk in compliance with the Group's risk measurement system and for the purpose of financial instruments holding, by verifying the methodological alignment of their overall structure with the Group's risk objectives;
- monitoring the limits established by the board of directors of the Parent company in relation to market and counterparty risk at all delegated levels and verifying the application of corrective actions taken due to any overdrafts or other vulnerable factors that emerge when monitoring risk;
- defining risk assessment and measurement methods for new financial instruments (product approval process);
- defining, determining and validating the methodologies chosen for aspects relating to the fair value of financial instruments traded by the Group: valuation models, usage criteria and hierarchy of pricing sources, rules, variables and methodologies feeding into market parameters, criteria and rules for fair value hierarchy classification;
- controlling and validating the designation at fair value of financial instruments

contained in the Trading Book and in the financial assets of the Banking Book;

- controlling and validating the market parameters used to assess and measure the risk of financial instruments held by the Group;
- validating P&L data at mark-to-market;
- defining, developing and updating the internal Trading Book market risk model for regulatory purposes and the internal model for counterparty risk in compliance with qualitative and quantitative requirements set out by the Supervisory authorities;
- quantifying market risk scenario analyses and stress tests for operational and regulatory purposes;
- carry out financial checks over the activities of business units;
- defining, developing and updating the risk measurement models inherent in the Group's interest rate and liquidity risk (ALM Banking Book);
- measuring the Liquidity regulatory indicators (LCR, NSFR);
- measuring the exposure to interest rate and liquidity risk, monitoring compliance with operational limits and implementing all appropriate actions to achieve overall optimisation, based also on appropriate scenario analyses;
- quantifying the scenario analyses and stress tests on credit, ALM and liquidity risk.

Operational and Reputational Risks has the task of:

- defining, developing and updating operational risk measurement models, with the internal model being monitored against the qualitative and quantitative requirements set out by the Supervisory authorities;
- coordinating the data collection process for operational losses, the risk assessment process as well as the process used to identify the more critical operational areas on the basis of scenario analyses;
- monitoring the measurements of internal capital in relation to operational risks for each business unit and for the Group in its entirety (Operational VaR);
- quantifying the effects of the Group's operational-risk mitigating actions on absorbed economic capital;
- defining, implementing, managing and updating the mathematical/statistical algorithms underlying the various measurement models and quantifying the scenario analyses and stress tests on operational risks;
- defining mitigation strategies and coordinating the development of IT risk models;
- identifying reputational risks inherent in the overall range of Group activities;
- developing models to monitor 'other' Second Pillar measurable 'risks';
- developing statistical-mathematical risk models partly in support of other organisational units.

Wealth Risk Management has the task of:

- defining metrics to assess and monitor the risk/performance of investment products, portfolios and services offered to customers;

- defining and developing methodologies and models to assess risk and performance of investment products, portfolios and services, making sure they are measured and monitored over time;
- defining and developing methodologies for verifying the appropriateness / adequacy of investment products, portfolios and services, so as to ensure consistency between the customer's risk profile and the risk profile of the financial instruments;
- assigning a risk class to products on offer by the Group in addition to other parameters which are relevant for adequacy checks;
- ensuring that all products invested in on the customer's initiative be assigned a risk class and measured against any other parameters required for adequacy checks;
- periodically compiling and updating the list of highest-risk companies/issuers (a.k.a. "MLR list"), whose financial instruments are deemed ineligible and inappropriate to be offered on an advisory basis;
- defining and monitoring the risk/ performance framework of operational limits applied to products, portfolios, wealth management lines, customer segments, etc.
- performing checks to monitor customer operations (operating limits, concentration, "gaps", etc.);
- monitoring changes in the risk class of investment products/services for the purpose of disclosure to customers;
- performing checks and monitoring activities on operations by customers of the Financial advisory Network;
- preparing the relative management and operating reports.

The Parent Company's **Validation, Monitoring and Risk Reporting Area** (hereinafter, **VMRRA**) continuously verifies the reliability of results obtained from the advanced risk measurement systems as well as their constant alignment with regulatory requirements. It prepares the required disclosure and management disclosure on risks. It performs second-level controls on the Group's credit exposures.

As at 31 December 2014, the VMRRA was organised into the following structures:

- Validation and Monitoring Service;
- Risk Reporting Service;
- Credit Exposures Control Service.

The **Internal Validation** Function has the task of:

- performing the internal validation procedure on the Internal Rating System and preparing the annual report on the Internal Credit Risk Model for regulatory purposes, to be submitted for approval by the Boards;
- performing the internal validation procedure and preparing the annual report on the Internal Operational Risk Model for regulatory purposes, to be submitted for approval by the Boards;
- performing the internal validation procedure on the other risk models not

used for regulatory purposes;

- analysing results from the efficiency testing of advanced systems and evaluating the adequacy of any remedial actions to be implemented.

The **Risk Reporting** Function has the task of:

- defining and monitoring the methods and modes used to produce disclosure on Group risk;
- coordinating and preparing the Pillar 3 Disclosure Report;
- coordinating, preparing and drawing up risk disclosure for official, external purposes (e.g., Budget, European Commissions, Rating Companies);
- coordinating and preparing Group Risk Disclosures for the governing bodies;
- monitoring and guiding risk management regulations and serve as liaison with the General Secretariat and Director in charge of risk management controls.

The **Credit Exposures Control Function** has the task of:

- carrying out second-level monitoring and control activities on credit exposures;
- expressing an opinion regarding the qualitative and quantitative compliance of the loan portfolio and, where necessary, triggering or initiating remedial actions for areas not deemed adequate.

The Risk Division of the Parent Company, which, as illustrated above, carries out Risk Management and Internal Validation Functions had an overall headcount of 97 units as at 31 December 2014. Staff had an average age of 40 and an average seniority in the banking sector of approximately 12 years. Resources show to have taken professional paths also outside the risk management area with significant experience gained in Group credit, finance, planning and sales functions. In terms of academic background, there is a prevalence of degrees in Economics/Banking/Business subjects (55%), followed by degrees in Mathematics/Statistics (14%), Engineering (10%), Physics and IT (6%), qualifications, diplomas or degrees in other subjects (15%). The majority of resources hold a post-degree qualification (Masters or Phd) or an international professional certification (e.g. Frm certification issued by GarP).

1.5 Credit Risk

The Budgeting, Planning, Capital and Risk Management processes of the Montepaschi Group are based on the "Risk Adjusted Performance Management" (RAPM) logic. In the development of these management processes, the definition of adequate credit policies – under the responsibility of the Parent company's credit management area – plays a relevant role which finds its operational expression in the implementation of the strategies (i.e. credit portfolio quality objectives), to be applied to the credit processes.

The Montepaschi Group's strategies in risk management mainly aim at limiting the economic impact of default on the loan book, exploiting, in particular, the full potential of the internal rating models and loss given default estimates. Strategies are defined on a yearly basis, together with the definition of Risk Appetite, except as otherwise provided under exceptional circumstances due to external conditions, and are identified for two main areas:

- loan disbursement strategies (definition of quality targets for access to credit);
- credit monitoring strategies (definition of minimum quality targets for maintenance of the loan disbursed).

The definition of customer acceptance policies, based on the analysis of the customer's prospective solvency, plays a major role in loan disbursement strategies. Only after having identified the customer with the required creditworthiness are other credit risk mitigation factors (guarantees) taken into account. Information on client quality and transaction risk is essential in identifying the decision-making body for loan granting.

The follow-up strategies are based on systems used on a daily/monthly basis to detect changes in the customer's risk profile. The identification of events likely to affect credit risk triggers a set of obligations for the distribution network, who is assigned the key task of keeping communication channels with the customer open and obtaining all useful information needed to verify the changes in the credit risk profile. If changes are confirmed, the client account manager is supported by personnel specialised in credit quality management and legal matter to define the credit risk management procedures required.

The quantitative identification of credit risk is mainly applied, at operational level, to the measurement of the risk-adjusted return of each individual operating unit. This process is carried out with operational control instruments. The credit risk identification and quantification instruments allow the Montepaschi Group to define hedging policies mainly consisting in defining "risk-adjusted pricing" which includes risk coverage and planned 'return on capital'.

Risk mitigation policies are defined as part of the Credit Risk Mitigation (CRM) process, whereby the legal, operational and organisational conditions necessary to use collateral guarantees for credit risk-mitigation purposes are identified and met. Three sets of guarantees complying with mitigation requirements are defined in the process: Personal securities, Financial collaterals and mortgage collaterals. Other types of credit protection guarantees do not mitigate credit risk. With specific regard to collaterals, a system has been developed to monitor the value of the collateralised asset, based on the measurement of market value (daily for securities and annual for real estate).

Within the credit-granting process, the Montepaschi Group has adopted a risk adjusted system for borrower identification, which is sensitive to the customer's rating and to the presence of collaterals. Should the value of the collateralised asset be subject to market or foreign exchange rate risk, a "safety margin" is used, i.e. a percentage of the end-of-period value of the collateral pledged, which is a function of the volatility of the collateralised asset. The only portion of the loan covered by the value of the assets net of the differential is considered as guaranteed during the approval phase. In the monitoring stages, an adjustment is required on guarantees for which the market value results as being lower than the authorized value net of the safety margin; notification of this step is channelled into the implementation process of the credit monitoring strategies. For further insight into risk mitigation Techniques, see Paragraph 5.5 below.

Credit Risk Management policies and disbursement processes are governed by specific Group directives. In terms of credit risk measurement models, credit risk is analysed using the credit Portfolio model, which was developed internally by the risk management area of the Parent company and produces detailed outputs in the form of traditional risk measures such as Expected loss, unexpected loss and intra-risk diversified Economic capital over a time horizon of one year and a confidence interval calibrated to the official target rating of the Montepaschi Group.

There are numerous inputs: Probability of default (PD), Loss Given Default (LGD) rates, number and types of guarantees supporting the credit facility, internal operational Exposure at default (EAD) and a correlation matrix. The latter component, which is based on internal estimates (and which is periodically fine-tuned in order to introduce more advanced measurement methods), makes it possible to quantify, for individual positions, the diversification/concentration components among the positions contained in the portfolio.

The economic capital calculation approach is based on Credit-VaR measurement systems and uses methods consistent with the best practices in the industry. The portfolio model's output provides detailed measures for individual positions as well as the absorbed working capital component and indicates the impact of diversification in the portfolio.

The model reveals the change in credit risk over time based on various combinations of the variables under analysis, by legal entity, customer type, geographic area, economic sector, rating class and continental area. Other information derived from the credit Portfolio model concerns "whatif" analyses produced for certain discriminating variables such as the Probability of default, LGD rates, changes in the value of collaterals and in margins available on the lines of credit in order to quantify the levels of Expected loss and Economic capital if the underlying (hypothetical or historical) assumptions prove to be true.

In accordance with the provisions of the Second Pillar of Basel 2, the Montepaschi Group is committed to the continuing development of methodologies and models in order to assess the impact on the loan book of stress conditions produced using sensitivity analyses with respect to individual risk factors or through scenario analyses.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

For further information, especially regarding the internal airb model, please refer to Paragraph 5.3.

1.6 Operational Risk

The Montepaschi Group has adopted an advanced management system for operational risk, with the aim of guaranteeing effective risk prevention and mitigation measures.

The risk management system consists in a structured process which identifies, assesses and monitors operational risks. This process is defined in the Group's Operational Risk Governance and Control Directive.

The operational risk management system adopted by the Group is divided into the following macro-processes:

- identification,
- measurement,
- monitoring,
- management and control,
- maintenance,
- internal validation,
- review.

Each process is clearly documented and is subject to the responsibility of a specific corporate function. The organizational units of the various Group subsidiaries are also involved in the processes.

Corporate policies and procedures assign the task of operational risk control to the risk management area. As previously illustrated, the Operational and Reputational risks Service has been set up within this area and is responsible for:

- defining, developing and updating operational risk management and measurement systems;
- coordinating data collection and storage systems;
- the reporting system on operational risks;
- assessing the operational risk profile and measuring the relative capital adequacy requirements at both individual and consolidated levels.

The management and measurement model designed and implemented by the Montepaschi Group incorporates the following four components:

- internal data on operational loss;
- external data on operational loss;
- factors regarding the operating context and the internal controls system;
- scenario analysis.

Classification of this data adopts the event and business line model established by the Basel accord and adds further classifications such as process, organisational unit, geographical area etc. The bank has defined a loss data collection (LDC) process aimed at collecting and storing operational risk data: this includes both information relating to the four components strictly provided for by the measurement system and other information considered significant for operating purposes.

The loss data collection process has been designed to ensure that data is complete, reliable and up-to-date and, therefore, that the management and measurement system using it is effective.

The single operational risk management application and the related database are also subject to business continuity and disaster recovery plans.

As far as the external data on operational loss is concerned, the Montepaschi Group has opted for a strongly prudential approach. External data derives from the Italian Operational losses database (Italian: DI PO) consortium to which the Montepaschi Group has belonged since its founding in 2003. In addition to the complete utilization of external loss data, the DI PO is also used for methodological purposes and for resolving any doubts in interpretation.

The analysis of contextual and control factors identifies the operational vulnerabilities to which the bank is exposed. In order to provide greater granularity of analysis, which is carried out with the individual process owners through annual self-assessments of operational risk control, the identification of vulnerabilities is a prospective evaluation aimed at highlighting the difficulties inherent in day-to-day operations.

Lastly, the Montepaschi Group carries out scenario analyses for its Top management on a yearly basis: the forward-looking analyses are aimed at measuring - in terms of capital - exposure to individual vulnerabilities with a view to capturing developments in the business and organisational framework.

To ensure the correct application of this methodology and its compliance with current regulations, the operational risk internal validation process has been allocated to the Validation, Monitoring and Risk Reporting Area. The quality of operational risk management and measurement systems is assessed on an ongoing basis as is their compliance with regulatory provisions, company needs and trends in the market of reference. Within this framework, it is also particularly important not only to verify the reliability of the methodology used in calculating capital adequacy, but also to ascertain the actual use of this system in decision-making processes as well as in the daily operational risk management systems.

Furthermore, the risk management area is in charge of producing reports on the operational risk measurement and control system, both for internal units and Supervisory authorities. Each macro-process in which the system is structured produces its own report within a wider reporting framework.

By defining a grid of contents, recipients and frequency of updates, the objective of this activity is to ensure timely horizontal and vertical communication of information on operational risks among the different corporate units concerned. Corporate regulations allocate the activity of internal auditing to the internal audit area. This consists in periodic checks on the overall functioning of the Montepaschi Group's operational risk management and control systems, so as to achieve an independent, comprehensive adequacy assessment in terms of efficiency and effectiveness. Once a year, the internal audit area compiles a report updating the various company entities on the auditing activities carried out, specifically highlighting vulnerabilities identified, corrective measures proposed and related findings.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

For more insights on operational risk, see also the following Chapter 12.

1.7 Market Risk in the Trading Book

The Montepaschi Group's Regulatory Trading Portfolio (RTP), or Trading book, is made up of all the Trading books managed by the Parent bank (BMPS), MPS Capital Services (MPSCS). The portfolios of the other retail subsidiaries are immune to market risk since they only contain their own bonds held to service retail customers. Trading in derivatives, which are brokered on behalf of the same customers, also calls for risk to be centralised at, and managed by MPSCS.

Market risks in the trading book are monitored in terms of Value-at-Risk (VaR) for operational purposes. Market risk assumption, management and monitoring are governed group-wide by a specific resolution approved by the board of directors. The Group's Finance and liquidity committee is responsible for directing and coordinating the overall process of managing the Group's proprietary finance thereby ensuring that the management strategies of the various business units are consistent.

Operating limits to trading activities are defined and set by the board of directors of the Parent company, in consistency with the Risk Appetite, and are expressed by level of VaR delegated authority, which is diversified by risk factors and portfolios, and in terms of monthly and annual Stop loss. The limits are monitored on a daily basis.

In addition to being included in VaR computations and in respective limits for the credit spread risk component, *Trading book* credit risk is also subject to specific operating limits of issuer and bond concentration risk, which specify the maximum notional amounts by type of guarantor and rating class on all investments in debt securities (bonds and *credit derivatives*).

Referring to the Parent Company specifically, the business area entrusted with trading activities is the Finance, Treasury and Capital Management Area (FTCMA) within the CFO Division. Trading activities for MPSCS are performed by the Global Markets Division.

The Business Units manage a proprietary portfolio which takes trading positions on interest rates, credit, shares, indices, commodities and foreign exchanges. In general, interest rate positions are taken by purchasing or selling bonds, and by creating positions in listed derivatives (futures) and OTCs (IRS, swap options). Trading is carried out exclusively on the Bank's own behalf, with objectives of absolute return, in compliance with the delegated limits of monthly and yearly VaR and Stop Loss.

In particular, the FTCMA operates in the short-term portion of the main interest rate curves, mostly through bonds and listed derivatives.

With regard to credit risk in the trading book, the equity positions are generally managed through the purchase or sale of bonds issued by companies or by creating synthetic positions in derivatives. The activity is oriented to achieving a long or short position on individual issuers, or a long or short exposure on specific commodities. The activity is carried out solely on the Bank's own behalf with objectives of absolute return and in compliance with other specific issuer and concentration risk limits approved by the Board of Directors.

The Montepaschi Group's Trading Book is subject to daily monitoring and reporting by the Parent Company's Risk Management on the basis of proprietary systems. VaR for management purposes is calculated separately from the operating units, using the internal risk measurement model implemented by the Risk Management function in keeping with international best practices. However, the Group uses the standardised methodology in the area of market risks solely for reporting purposes.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

For further quantitative details on market risk, please refer to Chapter 7.

1.8 Counterparty Risk

Counterparty risk is linked to potential losses due to the default of counterparties in financial transactions prior to settlement and is associated with financial instruments which have a positive value at the time of counterparty's default. The financial instruments which point to this kind of risk:

- generate an exposure that is equal to their positive fair value;
- have a market value which evolves over time depending on underlying market variables;
- generate an exchange of payments or an exchange of financial instruments or goods against payment.

The prudential treatment of counterparty risk is applied to the following types of financial instruments:

- credit and financial derivative instruments traded Over The Counter (OTC derivatives);
- Securities Financing Transactions (SFTs), such as: repos and reverse repos on securities or commodities, securities or commodities lending or borrowing transactions and borrowing on margin;
- Long Settlement Transactions (LSTs), such as: forward transactions in which a counterparty commits to delivering (receiving) a security, commodity or foreign currency against receipt (delivery) of cash payment, other financial instruments or goods with settlement upon a pre-established contractual date, later than the one determined by market practice for these types of transaction.

The scope of measurement for counterparty risk includes all banks and subsidiaries belonging to the Group and refers to positions held in the Banking Book and the Trading Book. As referred to in the Supervisory regulations, when measuring exposure to counterparty risk, the Montepaschi Group adopts the regulatory market value method to determine the Exposure at Default (EAD) for OTC and lST transactions and the comprehensive approach to calculate EAD for SFT transactions.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

For further quantitative details on counterparty risk and related management processes, please refer to Chapter 6.

1.9 Interest Rate Risk in the Banking Book

In accordance with international best practices, the Banking Book refers to all of the commercial operations of the Parent bank in relation to the transformation of maturities of balance-sheet assets and liabilities, Treasury, foreign branches, and hedging derivatives of reference. The scope of the Banking Book (in line with that for the regulatory book) and the ALM centralisation process are defined in a resolution by the board of directors of the Parent bank which sets rules for centralized Asset & Liability Management and operating limits for the interest rate risk of the Group banking book.

It is to be noted that the banking book also includes active bonds held for investment purposes, classified as either AFS or L&R. The same ALM rate risk metrics of measurement used for other commercial accounts were also applied to this aggregate.

The operational and strategic choices for the Banking Book, adopted by the Finance and Liquidity committee and monitored by the Risk Committee of the Parent bank, are based first on exposure to interest rate risk by a variation in the economic value of the banking book assets and liabilities and Net Interest income analysis, applying different scenarios on rate curves.

The Group adopts a rate risk governance and management system which, in accordance with the provisions of the Supervisory authority, avails itself of:

- a quantitative model, which provides the basis for calculation of risk indicators for the interest rate risk exposure of the Group and Group companies/entities;
- risk monitoring processes, aimed at the ongoing verification of compliance with the operational limits assigned to the Group overall and to the individual business units;
- risk control and management processes, geared toward bringing about adequate initiatives for optimising the risk profile and activating any necessary corrective actions.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the

Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

For further details on the methodologies developed in relation to the interest rate risk in the banking Book (Banking Book ALM) and related quantitative findings, please refer to Chapter 8.

1.10 Liquidity Risk

The Montepaschi Group structurally addresses liquidity risk with a formal LR management policy which also complies with the Basel 2, Pillar 2 requirements.

The Group adopts a liquidity risk governance and management system which, in accordance with the provisions of the Supervisory authority, pursues the following objectives:

- ensure the solvency of the Group and all its subsidiaries, both in 'business as usual' and in crisis conditions;
- optimise the cost of funding in relation to current and future market conditions;
- adopt and maintain risk mitigation instruments.

Within the above system, the following responsibilities are centralised in the Parent bank:

- definition of policies for Group liquidity management and liquidity risk control;
- coordination of Group policies' implementation by the companies included in the scope;
- governance of the Group's short-, mid and long-term liquidity position, both overall and at individual company level, through centralised operational management;
- governance of Group liquidity risk, both short- and long-term, ultimately guaranteeing the solvency of all subsidiaries.

In its steering function, the Parent bank therefore defines criteria, policies, responsibilities, processes, limits and instruments for managing liquidity risk, both in business as usual and in liquidity stress and/or crisis conditions, formalizing the Group's *Liquidity Risk Framework*. The Group companies included in the scope of application, to the extent that they exhibit a liquidity risk deemed significant, are responsible for abiding by the liquidity policies and limits defined by the Parent bank and the capital requirements set by the relevant Supervisory authorities.

Management of the Group's Operating liquidity is intended to ensure the Group is in a position to meet cash payment obligations in the short term. The essential condition for a normal course of business in banking is the maintenance of a sustainable imbalance between cash inflows and outflows in the short term. The benchmark metric in this respect is the difference between the net cumulative cashflow and the counterbalancing capacity, i.e. reserve of liquidity in response to stress conditions over a short time horizon.

Management of the Group's Structural liquidity is intended to ensure the structural financial balance by maturity buckets over a time horizon of more than one year, both at Group and individual company level. Maintenance of an adequate dynamic ratio between medium/long term assets and liabilities is aimed at preventing current and prospective short-term funding sources from being under pressure. The benchmark metrics, mitigated by specific internal operating limits set by the BoD, include gap ratios which measure the ratio of both total loans over more-than-1year and more-than-5-year maturity deposits and the ratio of loans to retail/corporate deposits regardless of their maturities.

The liquidity position is monitored under both business-as-usual and stress scenarios. The exercises have the twofold objective of timely reporting the bank's major vulnerabilities in exposure to liquidity risk and allowing for prudential determination of the required levels of *Counterbalancing Capacity* (liquidity buffer).

The contingency Funding Plan, drafted by the Finance, Treasury & Capital Management area, is the document which describes the set of tools, policies and processes to be enforced under stress or liquidity crisis conditions.

As part of the overall budgeting process and particularly within the scope of risk appetite, the liquidity risk Framework identifies the tolerance thresholds for liquidity risk, that is to say the maximum risk exposure deemed sustainable in a business-as-usual scenario and under stress conditions. The short/long-term liquidity risk limits derive from the setting of these risk appetite thresholds.

The short-term limit system is organised into three different levels that provide for a timely reporting of proximity to the operating limits, i.e. the maximum liquidity risk appetite set within the annual risk Tolerance process.

In order to immediately identify the emergence of vulnerabilities in the bank's position, the Group has developed a range of *Early Warnings*, classified as generic and specific depending on whether the individual indicator is designed to detect potential vulnerabilities in the overall economic context of reference or in the Group structure. The triggering of one or more early warning indicators is a first level of alert and contributes to the overall assessment of the Group's short-term level of Group liquidity.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

1.11 Equity Investment Portfolio Risk

The instrument used to measure the price risk of the Montepaschi Group's equity investments portfolio is Value-at-Risk (VaR). unlike the model used for the Trading book, however, this is a simulation model based on the Monte Carlo approach.

To estimate price volatility, the time series of market yields for listed companies and the time series of sector-based indices for unlisted ones are used. The VaR of the equity investment portfolio is determined with a confidence interval of 99% and a holding period of 1 quarter, in line with the mid-long term holding periods of positions.

Moreover, the above-described model, developed and maintained by the risk management area of the Parent company, makes it possible to measure the marginal risk contribution of each equity investment and to disaggregate the measurement made from the Group's perspective with respect to the equity investments held by each Legal Entity.

Risk analysis results for this risk segment are regularly channelled into the risk reporting flow generated by the Risk Division and submitted to the Parent Company's Risk Committee and Corporate Bodies.

For further accounting details on risk in the Equity Investments Portfolio, please refer to Chapter 9.

1.12 Business Risk

Business risk is a particular realm within Strategic risk. The Montepaschi Group measures business risk using an internally developed model, whose results are included in the calculation of the Group's Overall Economic Capital.

The main risk factors are identified in:

- revenue volatility (particularly decreases); the item 'Net income from banking activities' is used as a proxy;
- cost volatility (particularly increases); the item 'Operating Expenses' is used as a proxy.

The algebraic sum of these two items is the Operating income; this indicator is illustrative of the Group's earning capacity.

On the basis of these considerations, it is possible to define business risk as the volatility of the Operating income, with a particular focus on the non-perfect correlation between net income and expenses. Indeed, the Economic capital used to mitigate business risk is calculated as the capital required to cover the maximum mismatch between Net income from banking activities and Operating expenses, assuming a sudden reduction in Net income and an unexpected upturn in Expenses.

Internal capital to face business risk is calculated on the basis of the Group's Operating income (namely an indicator for the bank's profitability) using an *Earnings at risk* (Ear) parametric approach.

The time series of this indicator is provided monthly by the Planning area on the basis of data from the consolidated Financial Statements.

The Economic capital is quantified by the risk management area of the Parent company. Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

1.13 Real Estate Risk

Real Estate Risk is defined as the risk of incurring potential losses from unexpected changes in the value of the real estate portfolio as a result of the real estate market performance in general.

The Risk Management Area believed it appropriate to adopt internal approaches for the quantification of Economic capital for this particular type of risk. For operating purposes, the Montepaschi Group quantifies real estate risk using a VaR type parametric approach, assuming normal distribution for the logarithmic returns of the real estate portfolio, which can be broken down into the following stages:

- acquisition of data concerning the real estate portfolio and values of real estate indices;
- analytical correlation of each property with a suitable real estate benchmark index based upon the type of real estate, its use and its location;
- definition of annual logarithmic returns of all indices;
- calculation of the Economic capital of the real estate portfolio.

The Economic capital is quantified by the Risk Management Area of the Parent company.

Results from the analyses performed on this category of risk are regularly included in the more general flow of risk reporting produced by the Risk Division and submitted to the Parent Company's Risk Committee, Top Management and Corporate Governing Bodies.

1.14 Risk inherent in investment products/services and management of Reputational Risk associated with investment services

The Montepaschi Group's organizational structure includes a specific unit dedicated to *Wealth Risk Management*. The term "investment services" refers to operations with customers in the area of placement services; order execution, receipt and transmission; proprietary trading; portfolio management; investment advice. The risks associated with investment services are directly or indirectly reflective of the risks incurred by customers.

Therefore, control of these risks is particularly aimed at achieving the twofold objective of protecting customers and preventing any potential repercussions on the Group in terms of operational and reputational risk.

The organizational responsibility for overseeing group-wide measurement, monitoring and control procedures for financial risk, and therefore the mapping of investment products/services for the purpose of verifying compliance with MiFID, is an integral part of the responsibilities of Group integrated risk management. This is to ensure an efficient centralised governance of the direct and indirect risks which the Group incurs during the course of its operations.

Within the Risk Management Area of the bank's risk management division, this task is allocated group-wide to the Wealth risk management service. "Wealth risk management" focuses on the overall set of operational and management processes as well as measurement and monitoring tools/methods used to ensure overall consistency between customers' risk profiles and the risk inherent in investment products/portfolios offered to – or in any case held by - customers.

The regulatory framework for investment services and verifications of appropriateness is provided for by European MiFID regulations and Consob Regulation on Intermediaries no. 16190/2007. With regard to the third-level regulatory framework, Consob Communication no. 9019104/2009 ("Level 3 - Illiquid financial products") and subsequent inter-association guidelines on illiquid financial products issued in 2009 also play an important role. Wthin the regulatory framework, the ESMA guidelines on suitability requirements issued in June 2012, subsequent Consob Communication no. 12084516/2012 and ABI Guidelines for the application of ESMA guidelines of 5 March 2014 are also significant in connection with investment services. Still as third-level regulatory framework, in late December Consob issued Communication no. 97966/2014 on the distribution of complex financial products to retail customers. Lastly, with regard to regulations governing investment services, in 2014 the European Parliament and Council approved the texts of the MiFID II Directive (2014/65/EU) and of the MiFIR Regulation (600/2014). The process to transpose this regulatory evolution will continue over the next two years until 3 January 2017, the date on which they will become definitively effective.

All investment products (both Group and third-party), included or not in the catalogue of products offered to Group customers are subject to a specific risk mapping that adopt quantitative measurements of the market and credit risk factors and performs feedback of liquidity and complexity of such products. This mapping of the products is therefore one of the guiding criteria on the basis of which are conducted such checks adequacy of investment as part of the consulting service offered.

For the sake of simplicity, investment product risk mapping, performed with reference to individual risk macro-factors, is grouped under specific risk categories defined by appropriate keys.

A special focus is given by the Bank to the monitoring and prevention of potential financial and reputational risks which investment services, particularly in a context of financial crisis such as the one experienced over the last few years, may generate as a consequence of increased market volatility. The fast-moving and not always predictable market trends may result in both a potentially rapid change, upward or downward, in product risk and generate potential financial losses and prompt a changing attitude by customers towards their own financial investments.

For increased protection of customer investments, the list of highest-risk issuers/entities (a.k.a. Money Laundering List or MLR) has the objective of identifying companies undergoing a temporary critical phase, associated primarily with specific macroeconomic, corporate and/or sector-related situations or a lack of sufficient market information. Inclusion in the MLR list makes the financial instruments issued by these issuers/entities inappropriate and impossible to be offered on an advisory basis. Identification and monitoring of these factors are reflected in the WRM reporting for the Top management.

The organisational decision to centralise within the Parent company's risk management Function the overall control and governance of both operational and reputational risks, together with risks inherent in investment services/products, is therefore aimed at encouraging awareness and promoting an integrated management of the processes which may potentially generate reputational risks, in their wider sense, for the Group.

1.15 Summary of the main features of the Operational Internal Models for Risk measurement

Below is a summary of the main characteristics of the internal management models mentioned above, broken down into Pillar 1 and Pillar 2 risk.

Pillar 1 Risks

Type of risk	Current management
Credit	• Montecarlo simulation-based internal Credit VaR Model inclusive of intra-risk correlation
	• Measurement of Expected Loss and Economic Capital
	• Credit Risk Mitigation (CRM)
Market ***(Trading Book)*** **And Counterparty**	• Internal management model for Generic and Specific Risks based on historical simulation with analytical full revaluation
	• Internal management model for specific risks with Credit Spread VaR
	• Counterparty Risk: Current Value Method and Integral Method
Operational	• Internal AMA Model (BIA only for residual components)
	• Mitigation and insurance al location of risk

Pillar 2 Risks

Type of risk	Current management
Concentration	• Credit VaR internal model already includes concentration risk in the calculation of Economic Capital
	• Control and follow-up through internal calculation policies, determination of concentration and entropy indices
Market (ALM Banking Book)	• Internal Model Based on the Economic Value Approach, to determine the impact of interest rate variation on the bank's economic value (assets/liabilities) Sensitivity analys of Net Interest Income
	• Use of sensitivity analysis to determine the impact Diversified shifts (e.g. 25 bp, 100 bp, 200 bp)
	• On demand items and prepayment have been modelled and are included in periodically submitted risk measures
Equity Investment	• VaR Model based on direct observation or on comparable items. Montecarlo simulation-base approach and Equity VaR calculation
Liquidity	• Cash flows mismatching model, counterbalancing capacity determination; setting of operational (short term) and structural (medium/long term) limits, Stress Test
	• Liquidity Risk Framework. Risk Tolerance consistent with Budget e Risk Appetite
	• Alignment with new regulatory requirements. LCR and NSFR indicators
Business	• Earning-at-Risk approach
Real Estate	• Parametric VaR approach
Reputational	• Control based on specific organizational policies

1.16 Analysis of the Montepaschi Group's Economic Capital and Risk Integration Model

The Overall Economic Capital is intended as the minimum amount of capital resources required to cover economic losses resulting from unforeseen events generated by the simultaneous exposure to different types of risk. In order to quantify Economic Capital all types of risk come into play with the exception of liquidity and reputational risk. The risk management area of the Parent company periodically quantifies the Economic capital for each type of risk, mainly on the basis of internally developed models for each risk factor. The methodologies are largely developed with a Value-at-Risk (VaR) approach and are thus aimed at determining the maximum loss the Group may incur with a specific *holding period* and within a pre-set confidence interval.

For certain risk factors and specific portfolio categories (Credit Risk and Operational Risk in particular), the models were officially validated by the Supervisory authorities for regulatory purposes. The outputs from the models developed internally for the different risk factors (validated and operational) constitute the main tool for the day-to-day control and monitoring of the risk exposures generated in these areas and for the control of operating limits and delegated powers in accordance with the guidelines given and approved by the Parent company.

The Economic capital by risk factor, therefore, results from the corresponding operating metrics of risk quantification. VaR measurements by risk factor maintain their own "individual" validity in accordance with current regulations and international *best practices* and are determined with generally differentiated *holding periods* and confidence intervals.

The total of these macro risk-factors, which directly impact the Group's equity, is subject to regular measurement by the Parent company's risk management area. Instead, the Parent company's Planning Area is responsible for reporting risk adjusted *performance* results and determining the specific value creation in a *risk adjusted* logic using metrics of measurement consistent with both the income and absorbed economic capital components.

Moreover, it reformulates the risk measures received from the risk management area for the Group's individual legal entities and business units. The allocation of capital, in terms of balance, forecasts and periodical monitoring, is also determined –on the basis of measurements from the risk management area- by Planning in conjunction with the corporate bodies of each legal entity, with specific reports prepared according to the individual business lines of the banks included in the scope of consolidation. The reports are submitted to the Parent company's risk committee and the BoD for approval.

The Overall Economic Capital is calculated by the risk management area of the Parent company through the application of a suitable method of integration and results from the combined measurement of each risk factor listed. The measurements are standardized both in terms of time horizon (*yearly holding period*) and selected confidence interval (99.93%) - in line with the Montepaschi Group's target rating – and are subject to intra-risk and inter-risk diversification processes.

The methodologies at the basis of integration are founded upon the principle that the overall internal capital needed to cover the Group's exposure to all risks, does not simply involve adding up the individual risks (*building block approach*). This principle lies in the imperfect correlation among the risk factors. The joint impact of all risk factors is usually less severe for the reason that, because they are not perfectly correlated, benefits may emerge from diversification.

The initial risk integration methodologies used by the Montepaschi Group were based upon the 'variance-covariance' approach. As of 2009, it has been adopted an integration methodology based on a multivariate "Student t-copula" approach.

Against a simpler and less expensive implementation in terms of IT software and calculation times, the variance-covariance model is penalised by extremely strong underlying methodological assumptions (all marginal distributions and the joint distribution of losses follow a Normal distribution pattern) and does not correctly capture the *tail dependences* which are, on the other hand, fundamental to determining Economic capital with the percentiles normally used for this type of analysis. Using the actual loss data observed, the "Student t-copula" model is capable of more efficiently modelling the correlation among risk factors, without making assumptions on the marginal distributions and more appropriately capturing the tail dependences (and therefore the extreme episodes of joint losses simultaneously linked to the different risks.).

In addition to being more robust, this approach also results as being more prudential. In order for this model to be implemented, it was necessary to retrieve and reconstruct the time series of risk factor- induced losses and engineer an iT and computational infrastructure capable of producing this kind of data.

The final output reveals the Overall Economic capital or the Overall internal capital at Group-level, broken down by the different risk type, legal Entity and business unit, indicating the impact of inter-risk diversification with respect to the *building block* approach which, on the other hand, does not entail quantification.

The calculation, analysis and reporting frequency with which the Group's Economic capital is measured currently stands at one month. The table below illustrates the salient features capital of the individual internal models adopted by risk type, with the final column showing the processing within a logic of risk integration for the purpose of calculating Economic.

Main characteristics of models

Type of risks	Measure	Model	Risk factors	Correlation	Economic Capital Treatment
Performing loans	1 Y VaR, 99.93%	Credit VaR Internal model	PD and LGD differentiated by type of counterparty, CCF differentiated by product	Correlation based on multivariate analysis between internal default macroeconomic variables	Copula t-Student
Equity investments	3 M VaR, 99%	VaR Montecarlo	Volatility in stock prices and comparable indices	Correlations between Stock prices Correlation between proxy indices	1 Y, 99.93%, Copula t-Student
Market (Banking Book)	1 Y, shift sensitivity per 25bp	Maturity Gap	Bucketing on parallel and twist shift nodes of Interest rates		1 Y, 99.93%, Copula t-Student
Market (Trading Book)	1day VaR 99%	VaR hystorical simulation – full revaluation	All market risk factors (IR, EQ, FX, CS, …)	Implicit in the full revaluation historical simulation	1 Y, 99.93%, Copula t-Student
Operational	1 Y VaR, 99.9%	LDA integrated with external data, in addition to qualitative self assessment	Frequenza and severity by event type	T-Student Copula approach beetween various event types	99.93%, Copula t-Student
Business	1 Y EaR 99%	Parametric EaR	Volatility of costs and revenues	Correlation between costs and revenues	99.93%, Copula t-Student
Real Estate	1 Y VaR, 99%	Parametric VaR	Volatility of real estate indices	Correlation between proxy indices	99.93%, Copula t-Student

Other measurable risk factors of significance (e.g. Issuer Risk, UCITS risk) are included in the Economic Capital, on al add-on, non-diversified basis. Their quantification for Economic Capital purposes is carried out on the basis of methodologies borrowed from the regulatory supervisory approaches.

1.17 Stress Test Analysis

In compliance with the guidelines set forth by the Basel committee and *best practices*, new prudential supervisory provisions for banks require credit institutions to carry out adequate *stress testing* exercises. *Stress testing* is commonly described as "the set of quantitative and qualitative techniques with which banks assess their vulnerability to exceptional but plausible events".

The objective is thus to evaluate the impact of a "state of the world" that is considered extreme, but which, despite a low probability of occurrence, may generate significant economic consequences for the Group.

Among the events considered plausible for the definition of tension-inducing scenarios, the following are to be taken into consideration:

- *trend-based scenarios:* assumptions are made of shocks that are due to a combination of risk factors which were historically observed in the past and whose recurrence and plausibility retain a certain degree of likelihood and recurrence;
- *discretionary scenarios:* assumptions are made of shocks due to a combination of risk factors which may emerge in the near future, depending on the foreseeable environmental, social and economic developments.

Under 'exceptional events', low-frequency circumstances are considered, whose occurrence would have an extremely serious impact on the banking Group. Within this area, the Montepaschi Group's methodological approach to *stress-testing* is based upon the identification of main risk factors whose objective is to select events or combinations of events (scenarios) which reveal specific vulnerabilities at Group-level.

To this end, specific *stress test* plans have been put in place on Pillar 1 risks (credit, market and operational) which were then made to converge – together with stress events designed ad hoc on other risk factors – into an overall Pillar 2 stress test plan, aimed at determining the potential impact on the Group within the ICAA P process.

With regard to credit risk in particular, the Montepaschi Group has defined a macroeconomic regression model to estimate the variations in the Probability of Default as a function of changes in the main *credit drivers*. *Credit drivers* which significantly describe PD variations are identified beforehand.

On the basis of the regression model, credit driver disturbances are then estimated according to the current and prospective economic situation. The shock applied to the *credit drivers* determines the change in loan book PD, triggering the simulation of a hypothetical counterparty *downgrading*, with consequent risk variations in terms of Expected Loss, Unexpected Loss and Input from new Defaults.

With regard to Operational risk, appropriate historical scenarios are defined, which are relevant in terms of both *severity* and *frequency*. In this way, it is possible to evaluate the Group's vulnerability to exceptional events - in the case of severity -and plausible events, in terms of frequency.

As for market risk, stress tests consist in the definition of historical scenarios (main crises historically observed in international markets), or discretionary, isolating those components towards which the Group is particularly exposed and, therefore, more vulnerable. These stress events are applied and simulated upon Equity, Commodity, Credit Spread, Forex and interest rate on a daily basis.

In terms of Counterparty, Concentration and Issuer risk, a stress scenario has been defined that is consistent with the scenario used for credit risk. It is noted that a market stress event for EAD is also applied to counterparty risk based on a discretional scenario of changes in market drivers. For Equity Investment, Business and Real Estate Risk, on the other hand, *sensitivity* tests are defined with respect to specific, appropriately identified *risk factors*, thus determining scenarios of maximisation of historical volatility for the indices of reference.

With regard to interest rate risk in the Banking Book, stress scenarios are defined and differentiated shocks are applied to the individual nodes of the curves for the terms of reference. The results from the stress tests are submitted to the Top Management and Board of Directors. They are formally examined by the BoD as part of the ICAAP annual report approval process, with a view to providing a self-assessment of the current and prospective capital adequacy of the Montepaschi Group.

1.18 The Risk Disclosure Process

The importance of formalising an adequate internal process for the communication of relevant data is explicitly required by national legislation and by the main international bodies for the purpose of increasing the awareness of corporate bodies with regard to risk management at banking group level.

With regard to the Risk Disclosure Process, the Montepaschi Group has, over the years, prepared an overall framework of reference, through the following organisational and governance solutions:

- creation of specialised structures within the Risk Division for the governance of risk disclosure (Risk Reporting Service);
- regulations governing the operations of the Parent company's risk committee, with the explicit intention to regulate communication to the BoD of the documents discussed and the major decisions taken;
- regulations envisaging adequate risk reporting to be incorporated, for internal and external purposes, in all major Group Policy concerning risk, internal models, Financial accounting and Public disclosure;
- Provision of specific reporting flows to the

Chairman of the BoD, the Control and Risk Committee, the Board of Statutory Auditors and the CEO, with a periodic summary submitted to the BoD. These reporting flows should be intended as forming part of the Risk Management Division's regular disclosure on risk control. In this way, the intention was to further reinforce the risk communication process towards the Group's senior management.

The Risk management division includes the Risk Reporting Service, who have the task of supervising, developing and coordinating the Group's risk disclosure model, through the identification of all relevant players, systems, processes and reports. The model is structured into two levels. At a first level:

- each Service of the risk management area produces and validates its own risk metrics based on its internal management models and autonomously governed procedures;
- each Service of the risk management area produces its own operating risk reporting for internal operating purposes (i.e. validation report, control of operating limits) and for reconciliation with the BUs.

On a second level, the Risk Reporting Service starts from results produced by the Risk Management Area and:

- summarises the management risk reporting for internal and external purposes;
- integrates the management risk reporting with "key risk messages" highlighting issues of particular/critical significance, for submission to the Top management and other corporate bodies;
- interfaces with investor relations, units under the relevant manager in charge/ CFO, the General Secretariat and corporate affairs area on risk reporting issues.

The overall reporting framework includes at least one Group-wide report ("Risk Management Report"), with details of the following key items.

With regard to **Economic Capital**, analyses are carried out in order to:

- quantify and determine the absorption of the Montepaschi Group's diversified Economic capital by risk factor and Bank/ BU;
- compare against previous months;
- compare against budgeted risk appetite.

As far as credit risk is concerned, analyses are mainly conducted on the following:

- risks of the performing and defaulting loan portfolio by Legal Entity, Client Segment, Master Scale and Industrial Clusters;
- trends in the risks of the performing and defaulting loan portfolio;
- *quality breakdown* of the risks of the performing loan portfolio and composition of the defaulting loan portfolio;
- geographical and sectorial concentration analysis into different areas of economic activity.

With regard to **Assets & Liabilities Management and Liquidity risk**, the main analyses carried out relate to the following:

- impact on the economic value and on net interest income, by legal Entity, BU, curve bucket, technical form and currency;
- analysis of on demand accounts and related options;

- position of operational and structural liquidity;
- regulatory liquidity indicators,
- Stress Test; monitoring of operating limits of interest rate and liquidity risks.

As for **Trading Book Market Risk**, analyses are mainly focused on:

- trends in the market risk profile of the Group's Trading book: operational Var and P&L analysis;
- Var disaggregation by legal Entity and risk Factor, diversified and non-diversified Var;
- main portfolio exposures; analysis of issuer risk;
- VaR actual backtesting;
- Stress test;
- monitoring of operating limits.

In terms of operational Risk, analyses are mainly conducted on the following:

- data on losses (quantitative information);
- major-impact losses tracked in the quarter and analysis of causes;
- operational VaR analysis on different regulatory event types.

The Risk Management Report is regularly supplemented with specific monitoring activities on Risk in customer investment products/services. In particular, this section illustrates the risk profile of -and products held by- customers, according to the internal classification and service model adopted by the Montepaschi Group. Details of volumes under management or custody are provided, with a special focus on products included in MPS' active offerings. Portfolio advisory insight is also given into recommended optimal asset allocation as well as into the outcomes of portfolio adequacy checks and wealth management monitoring.

As needed, the Risk Management report is integrated with specific points/issues of attention (i.e. Equity investment Portfolio risk analysis, "ad hoc" simulations, Scenario analyses / Stress tests, etc.). The report also provides information with regard to progress made by the relevant units on main projects underway, as well as regulatory updates and in-depth reviews of primary topics of interest that, on a case by case basis, result as being of particular importance.

The basic contents of the report enable the Top Management and the Corporate Bodies to gain a sufficiently complete – though concise – overview of the Montepaschi Group's main risks, highlighting any possible vulnerabilities in the overall risk profile and its development over time, risk concentration in specific segments or business units, tensions in terms of 'erosion' of the operating limits delegated to the BoD, exposures to new markets/risk factors. Analysis of the actual Economic capital, in particular, makes it possible to assess the actual and prospective absorption at both cumulative level and with regard to each individual risk factor, even with reference to Second Pillar risks which fall within the assessment of Group capital adequacy for ICAAP purposes. Reporting is subject to continuous improvement with a view to making it increasingly more in line with control, operating guidance and corporate governance requirements.

1.19 Governance of the 'Pillar 3 (Basel Pillar 3) – Disclosure to the Public' process

Pillar 3 Disclosure to the Public") is internally governed by the Montepaschi Group in regulation no. 1 of the Parent company and a specific Group directive.

The Bod, in its capacity as the Group's **Strategic Supervision Body**:

- defines the Public Disclosure process; approves the organisational policies, procedures and units identified, as well as Group guidelines on the definition of the disclosure contents;
- approves periodic updates to the Public Disclosure.

With regard to the Public Disclosure process, the **Managing Body**, represented by the Parent company's MD/CEO:

- defines the objectives, roles and responsibilities of the Group's units involved in the process;
- assesses if the Pillar 3 Disclosure to the Public Disclosure provides market participants with a comprehensive picture of the Group's risk profile.
- issues the statements required by art. 435 of the CRR;
- submits periodic disclosure report updates to the BoD.

The Risk Reporting Service, for the Parent Company's Risk Management Area, is responsible for the overall supervision and general coordination of the above-described process and for the final drafting of the report. To this end, it avails itself of support from the following functions: Balance Sheet, Supervisory Reporting, Capital Adequacy Control and all other designated Group functions which contribute to and validate the information falling within their spheres of competence.

In the Montepaschi Group, a statement of responsibility by the Chief Reporting Officer is envisaged for the "Disclosure to the Public Pillar3" pursuant to paragraph 2 of art. 154-bis of the Consolidated Law on Finance.

The Pillar3 report as a whole is shared by and between the Risk Management Area, the CFO and the Chief Reporting Officer. It is then submitted to the CEO who presents it to the BoD for final approval. Once BoD approval is obtained, the report is published on the Group's website, as provided for by supervisory regulations.

The coordination function supports investor relations on Pillar3 related issues and collaborates in dealing with any feedback from the market on these issues.

In accordance with external provisions and with the internal controls system model adopted by the Montepaschi Group, the Internal Audit Area reviews the entire process with a view to verifying its setup and making sure that implementation is appropriate and effective and results are correct.

2. Scope of application

The disclosure contained in this document (disclosure to the Public) refers solely to the Monte dei Paschi di Siena "Banking Group" as defined by Supervisory provisions. The "prudential" scope of consolidation is determined according to prudential regulations and differs from the scope of the consolidated financial statements, determined under IAS/IFRS. For the calculation of regulatory capital and prudential requirements it identifies the prudential scope of consolidation and this can create mismatches between the data disclosed in this document and that included in the Consolidated Financial Statements.

These differences are mainly attributable to:

- consolidation, using the line-by-line method in the IAS/IFRS financial statements of non- banking, financial and operating companies (primarily the insurance segment) not included in the "Banking Group";
- consolidation at equity in the IAS/IFRS financial statements of companies operating in banking, financial and operating companies under joint control; these companies are consolidated proportionally under prudential supervision.

It is further noted that no non-consolidated entities are included.

It is noted no restrictions or other impediments exist that may prevent a prompt transfer of regulatory capital or funds within the Group.

The following table reports all entities included in the scope of consolidation as at 31 December 2014.

Tab. 2.1 – Scope of application at 31.12.2014

	Registered Office	Sector	Shareholding %	Type of relationship (a)	Voting rights % (b)	Treatment in the Balance Sheet	Treatment for Supervisory Purposes
BANCA MONTE DEI PASCHI DI SIENA S.p.a.	Siena	Banking				Full	Full
MPS LEASING E FACTORING S.p.a.	Siena	Leasing e factoring	100,00	1	100,00	Full	Full
BANCA MONTE PASCHI BELGIO S.A.	Bruxelles	Banking	100,00	1	100,00	Full	Full
MONTE PASCHI BANQUE S.A.	Parigi	Banking	100,00	1	100,00	Full	Full
MPS CAPITAL SERVICES - BANCA PER LE IMPRESE S.p.a	Firenze	Banking	99,92	1	99,92	Full	Full
WISE DIALOG BANK S.p.a. - WIDIBA	Milano	Banking	100,00	1	100,00	Full	Full
MONTE PASCHI FIDUCIARIA S.p.a	Siena	Trust Company	100,00	1	100,00	Full	Full
CONSUM.IT S.p.a	Firenze	Consumer credit	100,00	1	100,00	Full	Full
INTEGRA S.p.a	Firenze	Consumer credit	50,00	7	50,00	Consolidate at Equity	Proportional
MPS TENIMENTI POGGIO BONELLI e CHIGI SARACINI SOCIETA' AGRICOLA S.p.a	Siena	Wine industry	100,00	1	100,00	Full	Consolidate at Equity
MPS PREFERRED CAPITAL I LLC	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
MPS CAPITAL TRUST I	Delaware	Financial vehicle	-	4	-	Full	Full
MPS PREFERRED CAPITAL II LLC	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
MPS CAPITAL TRUST II	Delaware	Financial vehicle	-	4	-	Full	Full
MONTE PASCHI CONSEIL FRANCE SOCIETE PAR ACTIONS SEMPLIFIEE	Parigi	Financial intermediary	100,00	1	100,00	Full	Full
MONTEPASCHI LUXEMBOURG S.A.	Lussemburgo	Financial vehicle	100,00	1	100,00	Full	Full
ANTONVENETA CAPITAL LLC I	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
ANTONVENETA CAPITAL LLC II	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
ANTONVENETA CAPITAL TRUST I	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
ANTONVENETA CAPITAL TRUST II	Delaware	Financial vehicle	100,00	1	100,00	Full	Full
CIRENE FINANCE S.r.l	Conegliano	Special purpose vehicle	60,00	1	60,00	Full	Full
MAGAZZINI GENERALI FIDUCIARIMANTOVA S.p.a	Mantova	Deposit and custody warehouses (for third paries)	100,00	1	100,00	Full	Full
CONSORZIO OPERATIVO GRUPPO MPS	Siena	IT and Information services	99,91	1	99,91	Full	Full
PERIMETRO GESTIONE PROPRIETÀ IMMOBILIARI S.c.p.a.	Siena	Real estate	100,00	1	100,00	Full	Full
MPS COVERED BOND S.r.l	Conegliano	Special purpose vehicle	90,00	1	90,00	Full	Full
MPS COVERED BOND 2 S.r.l	Conegliano	Special purpose vehicle	90,00	1	90,00	Full	Full
G.IMM.ASTOR S.r.l	Lecce	Real estate renting	52,00	1	52,00	Full	Full

Tab. 2.1 – Area di consolidamento 31.12.2014 *(segue)*

	Sede	Settore	% di Partecipaz	Tipo di Rapporto (a)	Disponib. Voti % (b)	Trattamento ai Fini del Bilancio	Trattamento ai Fini della Vigilanza
IMMOBILIARE VICTOR HUGO S.C.I.	Parigi	Real estate	100,00	1	100,00	Full	Full
AIACE REOCO S.r.l.	Siena	Real estate	100,00	1	100,00	Full	Full
ENEA REOCO S.r.l.	Siena	Real estate	100,00	1	100,00	Full	Full
CO.E.M. COSTRUZIONI ECOLOGICHE MODERNE S.p.a.	Roma	Real estate	40,20	4	40,20	Full	Consolidate at Equity
MANTEGNA FINANCE II S.r.l.(in liquidazione)	Conegliano	Special purpose vehicle	100,00	1	100,00	Full	Full
CASAFORTE S.r.l.	Roma	Special purpose vehicle	-	4	-	Full	Full
SIENA MORTGAGES 07-5 S.p.a.	Conegliano	Special purpose vehicle	7,00	4	7,00	Full	Full
SIENA MORTGAGES 09-6 S.r.l.	Conegliano	Special purpose vehicle	7,00	4	7,00	Full	Full
SIENA MORTGAGES 10-7 S.r.l.	Conegliano	Special purpose vehicle	7,00	4	7,00	Full	Full
SIENA SME 11-1 S.r.l.	Conegliano	Special purpose vehicle	10,00	4	10,00	Full	Full
SIENA LEASE 11-1 S.r.l.	Conegliano	Special purpose vehicle	100,00	1	100,00	Full	Full
SIENA CONSUMERS.r.l.	Conegliano	Special purpose vehicle	10,00	4	10,00	Full	Full
PATAGONIA FINANCE S.A.	Lussemburgo	Financial vehicle	-	4	-	Full	Consolidate at Equity

(a) Type of relationship:
1 majority of voting rights at ordinary shareholders' meetings
2 dominant influence at ordinary shareholders' meetings
3 agreements with other shareholders
4 other forms of control
5 unified management under art. 26.1 of Decree 87/92
6 unified management under art. 26.2 of Decree 87/92
7 joint control

(b) Actual voting rights in ordinary shareholders' meetings.

3. Own Funds

Own funds, an element of Pillar 1, are calculated according to Basel 3 rules implemented in Europe through a comprehensive body of regulations, consisting of the Capital Requirements Regulation (CRR), European Regulation no. 575/2013, and related integrations, by the Capital Requirements Directive (CRD IV), by Regulatory Technical Standards and Implementing Technical Standards issued by the EBA, and by supervisory instructions issued by Bank of Italy (specifically, Circular nos. 285 and 286). The introduction of Basel 3 regulations is subject to a transition period that extends the full application of the rules to 2019 (2022 for the phase-out of certain capital instruments) and during which the new rules will be applied in an increasing proportion.

Own funds, calculated according to the transitional arrangements in force, differ from the net equity book value since prudential regulations aim to protect the quality of assets and reduce any potential volatility caused by the application of IAS/IFRS. The items that constitute own funds, therefore, must be fully available to the Group so that they may be used to cover risks and losses without any restrictions. Institutions are, in fact, required to demonstrate the quality and quantity of own funds in compliance with applicable European legislation. For this purpose for the New Financial Instruments (NFIs), considered within a context of State aid, may be included in CET 1 up to 31.12.2017.

The Bank's Own Funds is made up of the following:

- ✓ Tier 1 (T1) capital, consisting of Common Equity Tier 1 (CET1) and Additional Tier 1 (AT1);
- ✓ Tier 2 (T2).

For a detailed description of the items included in Own Funds (CET1, AT1, T2) whether relating to transitional or final requirements, and of the NFIs, please refer to the Annual Financial Report as at 31 12 2014 - Notes to Part F – Information on consolidated shareholders' equity. As provided for in Circular 285 of 17 December 2013, in January 2014 MPS Group exercised the option to exclude from CET1 the unrealised profits and losses on exposures with central governments classified in the AFS portfolio, until approval by the European Commission of the IFRS that replaces IAS 39 following the introduction of national discretion rules provided for by the CRR established as part of the transition requirements by Bank of Italy.

The AFS reserve linked to AFS securities (BTP) in the Alexandria transaction deviates from the general rule. More specifically, following the Supervisory Review and Evaluation Process (SREP), the ECB requested the inclusion of 100% of unrealised losses on Italian government bonds (BTP) encompassed in the 'Alexandria transaction' in the calculation of CET 1. Accordingly, the entire amount of the negative reserve related to the government bonds that were the subject of the transaction, above mentioned (amounting to EUR 423 mln as at 31 December 2014) was included in the CET 1 Calculation. Unrealised losses relating to exposures to central administrations classified as AFS and not included in the Capital calculation amount to EUR 164.4 mln. The amount takes into account the treatment of the Alexandria transaction as requested by the Supervisory Authority. Subsequent to the SREP, and as requested by the Supervisory Authorities, the Patagonia vehicle was consolidated, also for prudential purposes. This accounting treatment resulted in a Tier 2 reduction by approximately EUR 100 mln as at 31 December 2014. Patagonia Finance S.A. is a vehicle that issued asset-backed securities (ABS) which were subscribed by insurance companies and pledged as collateral of unit-linked policies. The vehicle invests in subordinated securities issued by BMPS. For further details, please refer to the Consolidated Financial Report as at 31 12 2014. In light of the above, the treatment adopted on a prudential basis following the ECB's indications represents a deviation from the more favourable general rule, under which the AFS reserve relating to government bonds, until validation of IFRS 9, is not relevant for determining capital. Below are the main features of the financial instruments which are included in Common Equity Tier 1.

Features of CET 1 instruments

Order No.	Features of the instruments	Interest rate	Step up	Issue Date	Expiration Date	Early re-payment starting from	Currency	Grandfathering	Original Amount (€/thousand)	Contribution to regulatory capital (€/thousand)
-	Own Shares	N.A.	NO	N.A.	N.A.	N.A.	EUR	no	12,297,339	12,297,339
1	New Financial Instruments /ex "Tremonti Bond"	9,5%	YES	28/02/13	N.A.	(a)	EUR	yes	4,071,000	1,071,000
	Total Capital Instruments (CET 1)									**13,368,339**

*(a) **New Financial Instruments** NFIs (ex Tremonti Bond) were issued by Banca Monte dei Paschi di Siena S.p.A. on 28 February 2013 pursuant to article 23-sexies of Law Decree no. 95 of 6 July 2012, converted, with amendments, into Law no.135 of 7 August 2012, as subsequently amended. the NFIs are financial instruments which may be converted into ordinary shares by the issuer BMPS and are characterised by subordination pari passu with ordinary shares, in the event of both voluntary liquidation or bankruptcy proceedings and under going concern assumptions. In particular, on a going-concern basis, the NFIs absorb losses that reduce the capital ratio to below 8% in the same proportion with respect to the share capital and reserves, by reducing the nominal value*

Below are the main features of the financial instruments which are included in Additional Tier 1.

Features of Additional Tier 1 instruments

Order No.	Features of the instruments	Interest rate	Step up	Issue Date	Expiration Date	Early re-payment starting from	Currency	Grandfathering	Original Amount (€/thousand)	Contribution to regulatory capital (€/thousand)
-	F.R.E.S.H. 2008 - not computable in CET 1 capital share	N.A.	NO	N.A.	N.A.	(a)	EUR	no	189,158	189,158
2	F.R.E.S.H. (Floating Rate Equity-Linked Subordinated Hybrid)	Euribor 3m + 88 bps.	NO	30/12/03	N.A.	(b)	EUR	no	700,000	27,915
3	Capital Preferred Securities I^ tranche	Euribor 3m +6,3%	YES	21/12/00	N.A.	(c)	EUR	YES	80,000	43,238
4	Capital Preferred Securities II^ tranche	Euribor 3m 6,3%	YES	27/06/01	N.A.	(c)	EUR	YES	220,000	85,202
5	Preferred Capital I LLC	Euribor 3m +6,3%	YES	07/02/01	N.A.	(d)	EUR	YES	350,000	192,906
	Total Preference share and Capital Instruments (AT 1)									**538,419**

(a) F.R.E.S.H. 2008 refers to the EUR 950 mln capital increase reserved to JP Morgan. By virtue of a usufruct contract between the Bank and JP Morgan, the latter only has the bare ownership of the shares, while the Bank is entitled to the voting rights and the dividends. Under this contract, in the event of profits subject to distribution the Bank shall pay a fee to the counterparty. Following a free share capital increase of EUR 750 mln approved in 2012 applicable to the share premium reserve, the portion of the 2008 reserved capital increase that has AT1 characteristics as at 31 December 2014 amounts to EUR 189 mln.

(b) The innovative capital instruments F.R.E.S.H. (Floating Rate Equity-linked Subordinated Hybrid notes) issued by the vehicle "MPS Preferred Capital II LLC", for an original nominal value of EUR 700 mln, are perpetual instruments and as such contain no redemption or step-up clauses but are convertible into shares. In September of each year from 2004 through 2009 and however, at any time effective as of 1 September 2010, the instruments are convertible upon the investor's initiative. In addition, an automatic conversion clause is provided for in the event that, after the seventh year from date of issue, the reference price of the ordinary shares should exceed a set amount. For the portion still outstanding, it is noted that the return is non-cumulative, with an option for it not to be paid if, during the previous year, the Bank did not register any distributable profits and/or did not pay any dividends to its shareholders. Any unpaid consideration shall be considered as forfeited. The rights of the note holders are guaranteed on a subordinated basis. In the event of liquidation of the Parent Bank, the rights of the investors will be subordinated to all of the Parent Bank's creditors who are not equally subordinated, including holders of securities coming under Tier 2 capital and will override the rights of Parent Bank's shareholders. In virtue of these characteristics, these instruments are eligible for inclusion in core Tier1. Within the overall structure, a limited liability company and a business Trust were set up, which have respectively issued convertible preferred and convertible trust securities. The Parent Company underwrote an on-lending contract in the form of a subordinated deposit agreement. The conditions of the on-lending agreement are substantially the same as the conditions of the convertible preferred securities. For these securities, the issuer exercised the option not to proceed with payment of interest accrued on the coupon dates scheduled, as of 30 September 2013.

(c) Capital Preferred Securities, Antonveneta Capital Trust I and Antonveneta Capital Trust II are non-redeemable securities. For these securities, the issuer exercised the option not to proceed with payment of interest accrued on the coupon dates scheduled, as of 21 September 2013 and 27 September 2013 respectively.

(d) Preferred Capital Shares I LLC are non-redeemable. For these securities, the issuer exercised the option not to proceed with payment of interest accrued on the coupon dates scheduled, as of 7 February 2013.

Below are the main features of the financial instruments which are included in Tier 2.

Features of Tier 2 instruments

Order No.	Features of the instruments	Interest rate	Step up	Issue Date	Expiration Date	Early re-payment starting from	Currency	Grandfathering	Original Amount (€/thousand)	Contribution to regulatory capital (€/thousand)
6	Subordinated Bond Loan	4,875% fixed	NO	31/05/06	31/05/16	N.A.	EUR	no	750,000	167,105
7	Subordinated Bond Loan	5,750% fixed	NO	31/05/06	30/09/16	N.A.	GBP	no	200,000	31,133
8	Subordinated Bond Loan	Euribor 6m+2,50%	NO	15/05/08	15/05/18	N.A.	EUR	no	2,160,558	1,456,543
9	Subordinated Bond Loan	CMS Convexity Notes	NO	07/07/00	07/07/15	N.A.	EUR	no	30,000	3,089
10	Subordinated Bond Loan	CMS Volatility Notes	NO	20/07/00	20/07/15	N.A.	EUR	no	25,000	2,752
11	Subordinated Bond Loan	5,6% fixed	NO	09/09/10	09/09/20	N.A.	EUR	no	500,000	376,733
12	Subordinated Bond Loan	Euribor 3m+0,40 % fino al 30/11/2012, poi Euribor 3m+1%	YES	30/11/05	30/11/17	30/11/12	EUR	no	500,000	214,837
13	Subordinated Bond Loan	7% fixed	NO	04/03/09	04/03/19	N.A.	EUR	no	500,000	417,306
14	ubordinated Bond Loan	5% fixed	NO	21/04/10	21/04/20	N.A.	EUR	no	500,000	364,700
15	ABN AMRO Subordinated Bond Loan	Euribor 3m+2,8%	NO	10/10/06	10/10/16	10/10/11	EUR	no	400,000	142,169
	Total Capital Instruments (Tier 2)									**3,176,367**

Grandfathering*. A gradual exclusion from the relevant capital level is envisaged for capital instruments issued previously and calculated in regulatory capital through 31 December 2013 that do not meet the requirements of the new regulatory framework. Specifically, 80% of the nominal value outstanding in 2014 may be included in the CET1, AT1 and T2 calculation, decreasing 10% per year until its full exclusion in 2022, for those instruments issued or calculated in the regulatory capital prior to 31 December 2011 that do not meet the new requirements.*

The following tables contain the complete terms and conditions of all Common Equity Tier 1, Additional Tier 1 and Tier 2 capital instruments, according to the disclosure template provided for in the COMMISSION IMPLEMENTING REGULATION (EU) No 1423/2013 of 20 December 2013. The latter lays down the implementing technical standards for the disclosure of Own Funds requirements according to Regulation (EU) No 575/2013 of the European Parliament and of the Council.

Capital instruments' main feature template

	Order No.	1	2	3
1	Issuer	Banca Monte dei Paschi di Siena S.p.A.	MPS Capital Trust 2	Antonveneta Capital Trust 1
2	Unique identifier	IT0004897937	XS0180906439	XS0122238115
3	Governing law(s) of the instrument	Italian Law	Instrument: Law of the State of Delaware. Subordination clauses: Italian law	Instrument: Law of the State of Delaware. Subordination clauses: Italian law
	Regulatory treatment			
4	Transitional CRR rules	CET1	Additional Tier 1	Additional Tier 1
5	Post-transitional CRR rules	Ineligible	Additional Tier 1	Inegible
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Individual and Consolidated	Consolidated	Consolidated
7	Instrument type	New financial instruments provided for in art. 23-sexies of Law Decree 95/12 "Monti bond"	Mandatory convertible - Art 51	Preferred Securities - Art 51 e 484 CRR
8	Amount recognised in regulatory capital (€/thousand)	1,071,000	27,915	43,238
9	Nominal amount of instrument	4,071,000,000	700,000,000	80,000,000
9a	Issue price	100.00%	€ 3.28	98.35%
9b	Redemption price	(a)	N/A	100.00%
10	Accounting classification	Liabilities - Amortised cost	Separated: liabilities at amortized cost and equity instrument	Liabilities - Amortised cost
11	Original date of issuance	28/02/13	30/12/03	21/12/00
12	Perpetual or dated	Irredeemable	Irredeemable	Irredeemable
13	Original maturity date	No expiration	No expiration	No expiration
14	Issuer call subject to prior supervisory approval	Yes	No	Yes
15	Optional call date, contingent call dates and redemption amount		"Tax Event" - at par "Regulatory Event"" - at par "Change in law event" - at par	21/03/11 "Tax Event" - at par "Regulatory Event"" - at par "Investment company act event" - at par
16	Subsequent call dates, if applicable		N/A	Each interest payment date
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Fixed	Floating	Floating
18	Coupon rate and any related index	9,5%(b)	Eur 3M + 88 bps	Eur 3M + 630 bps
19	Existence of a dividend stopper	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Partially discretionary	Partially discretionary
	Fully discretionary, partially discretionary or mandatory (in terms of timing) - reasons		Lack of distributable income, ban imposed by the applicable law, non-compliance of the total capital requirement; "dividend pusher"	Lack of distributable income, ban imposed by the applicable law, non-compliance of the total capital requirement; "dividend pusher"
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Partially discretionary	Partially discretionary
21	Existence of step up or other incentive to redeem	Yes		Yes
22	Noncumulative or cumulative	Alternative Coupon Satisfaction Mechanism (ACSM)	Noncumulative	Noncumulative
23	Convertible or non-convertible	Convertible	Convertibile	Non-convertible
24	If convertible, conversion trigger(s)	At the request of the issuer	At the request of the Bondholder: automatically if certain trends in the market price of the share; 'capital deficiency event'	N/A
25	If convertible, fully or partially	In whole or in part	In whole or in part	N/A
26	If convertible, conversion rate	(c)	15.95	N/A
27	If convertible, mandatory or optional conversion	Optional on request of the issuer	Mandatory / optional at the request of bondholders	N/A
28	If convertible, specify instrument type convertible into	Ordinary shares	Ordinary shares	N/A
29	If convertible, specify issuer of instrument it converts into	Banca Monte dei Paschi di Siena	Banca Monte dei Paschi di Siena	N/A
30	Write-down features	Yes	No	Yes

31	If write-down, write-down trigger(s)	Total Capital Ratio <8%	N/A	Capital deficiency
32	If write-down, full or partial	Fully or partially	N/A	Fully
33	If write-down, permanent or temporary	Temporary	N/A	Permanent
34	If temporary write-down, description of write-up mechanism	Net income will be allocated to the restoration of the Nominal Value of Securities in proportion than is attributable to the share capital and reserves	N/A	In the event of liquidation
35	Position in subordination hierarchy in liquidation	Add Tier 1 (pari passu with ordinary shares)	Tier 2	Tier 2
36	Non-complaint transitioned features	Yes	No	Yes
37	If yes, specify non-compliant features	State aid rules (art 483)		Step up; payment coupons not fully discretionary ("dividend pusher")

N/A: The information does not apply to the instrument.

(a) Repayment of the instruments will occur at the greater of the following values:
- *an increasing percentage of the nominal value over time (100% by 30 June 2015, then increased by 5% every two years up to a maximum of 160%);*
- *the product of shares underlying the NFIs and the price paid in the event of a takeover bid on BMPS after the subscription date;*
- *the product of shares underlying the NFIs and the price received by the Foundation MPS in the event that over 10% of its shareholding is sold over a period of 12 months.*

(b) With regard to interest payment on NFIs:
- *Interest on NFIs is calculated on a pro rata basis by applying a fixed rate of 9% to the nominal value for the first year (2013) with a subsequent step up of half a point every years until the 15% cap is reached.*

(c) If convertible, conversion rate: for Securities where the conversion option may be exercised, the number of shares issued to the MEF will result from the following formula:
NS = NV/SP
where NV is the Nominal Value of Securities, SP is the subscription price calculated as TERP (Theoretic Ex Rights Price) multiplied by (1 – Discount on TERP).
TERP is calculated as:
TERP = [(K+NV)(1-D)-NV]/[C*(1-D)]*
where K is the total value of shares of the Issuer, calculated as an average of the share price in the 5 consecutive trading days prior to the date on which the conversion option is exercised multiplied by the number of shares themselves; NV is the Nominal Value of Securities to be converted; D is the Discount on the TERP, set at 30%; C is the number of the Issuer's ordinary shares outstanding immediately prior to exercising the conversion option.

	Order No.	4	5	6
1	Issuer	Antonveneta Capital Trust 2	MPS Capital Trust 1	Banca Monte dei Paschi di Siena S.p.A.
2	Unique identifier	XS0131739236	XS0121342827	XS0255820804
3	Governing law(s) of the instrument	Instrument: Law of the State of Delaware. Subordination clauses: Italian law	Instrument: Law of the State of Delaware.	Instrument: English Law. Subordination clauses: Italian law
	Regulatory treatment			
4	Transitional CRR rules	Additional Tier 1	Additional Tier 1	Tier 2
5	Post-transitional CRR rules	Ineligible	Ineligible	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Consolidated	Consolidated	Individual and Consolidated
7	Instrument type	Preferred Securities - Art 51 e 484 CRR	Preferred Securities - Art 51 e 484 CRR	Tier 2 - Art 62
8	Amount recognised in regulatory capital (€/thousand)	85,202	192,906	167,105
9	Nominal amount of instrument	220,000,000	350,000,000	750,000,000
9a	Issue price	100.00%	100.00%	99.22%
9b	Redemption price	100.00%	100.00%	100.00%
10	Accounting classification	Liabilities - Amortised cost	Liabilities - Fvo	Liabilities - Amortised cost
11	Original date of issuance	27/06/01	07/02/01	31/05/06
12	Perpetual or dated	Irredeemable	Irredeemable	At maturity
13	Original maturity date	No expiration	No expiration	31/05/16
14	Issuer call subject to prior supervisory approval	Yes	Yes	No
15	Optional call date, contingent call dates and redemption amount	27/09/11 “Tax Event” - at par “Regulatory Event”” - at par “Investment company act event” - at par	07/02/11 “Tax Event” - at par “Regulatory Event” - at par “Investment company act event” - at par	N/A “Tax Event” - at par
16	Subsequent call dates, if applicable	Each interest payment date	Each interest payment date	N/A
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Floating	Fixed to Floating	Fixed
18	Coupon rate and any related index	Eur 3M + 630 bps	Eur 3M + 630 bps	4.875%
19	Existence of a dividend stopper	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Partially discretionary	Partially discretionary
	Fully discretionary, partially discretionary or mandatory (in terms of timing) - reasons	Lack of distributable income, ban imposed by the applicable law, non-compliance of the total capital requirement; "dividend pusher"	Lack of distributable income, ban imposed by the applicable law, non-compliance of the total capital requirement; "dividend pusher"	Non-payment of dividends
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Partially discretionary	Partially discretionary
21	Existence of step up or other incentive to redeem	Yes	Yes	
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Cumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	Yes	Yes	N/A
31	If write-down, write-down trigger(s)	Capital deficiency	Capital deficiency	N/A
32	If write-down, full or partial	Fully	Fully or partially	N/A
33	If write-down, permanent or temporary	Permanent	Temporary	N/A
34	If temporary write-down, description of write-up mechanism	In the event of liquidation	Revalued when is restored Minimum Capital or in the event of liquidation	N/A
35	Position in subordination hierarchy in liquidation	Tier 2	Tier 2	Lower Tier 2
36	Non-complaint transitioned features	Yes	Yes	No
37	If yes, specify non-compliant features	Step up; payment coupons not fully discretionary ("dividend pusher")	Step up; payment coupons not fully discretionary ("dividend pusher")	

N/A: The information does not apply to the instrument.

	Order No.	7	8	9
1	Issuer	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.
2	Unique identifier	XS0255817685	IT0004352586	XS0114020380
3	Governing law(s) of the instrument	Instrument: English Law. Subordination clauses: Italian law	Italian Law	Instrument: English Law. Subordination clauses: Italian law
	Regulatory treatment			
4	Transitional CRR rules	Tier 2	Tier 2	Tier 2
5	Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Individual and Consolidated	Individual and Consolidated	Individual and Consolidated
7	Instrument type	Tier 2 - Art 62	Tier 2 - Art 62	Tier 2 - Art 62
8	Amount recognised in regulatory capital (€/thousand)	31,133	1,456,543	3,089
9	Nominal amount of instrument	200,000,000	2,160,558,000	30,000,000
9a	Issue price	99.92%	100.00%	100.00%
9b	Redemption price	100.00%	100.00%	100.00%
10	Accounting classification	Liabilities - Amortised cost	Liabilities - Amortised cost	Liabilities - Fvo
11	Original date of issuance	31/05/06	15/05/08	07/07/00
12	Perpetual or dated	At maturity	At maturity	At maturity
13	Original maturity date	30/09/16	15/05/18	07/07/15
14	Issuer call subject to prior supervisory approval	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A "Tax Event" - at par	N/A	N/A "Tax Event" - at par
16	Subsequent call dates, if applicable	N/A	N/A	N/A
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Fixed	Floating	Fixed
18	Coupon rate and any related index	5.75%	Eur 6M + 250 bps	11.02%
19	Existence of a dividend stopper	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Partially discretionary	Partially discretionary	Mandatory
	Fully discretionary, partially discretionary or mandatory (in terms of timing) - reasons	Non-payment of dividends	Negative operating performance, to the extent necessary to prevent or limit the operating loss	
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Partially discretionary	Partially discretionary	Mandatory
21	Existence of step up or other incentive to redeem			
22	Noncumulative or cumulative	Cumulative	Cumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertibile
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	N/A	N/A	N/A
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation	Lower Tier 2	Lower Tier 2	Senior
36	Non-complaint transitioned features	No	No	No
37	If yes, specify non-compliant features			

N/A: The information does not apply to the instrument.

	Order No.	10	11	12
1	Issuer	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.
2	Unique identifier	XS0113603277	XS0540544912	XS0236480322
3	Governing law(s) of the instrument	Instrument: English Law. Subordination clauses: Italian law	Instrument: English Law. Subordination clauses: Italian law	Instrument: English Law. Subordination clauses: Italian law
	Regulatory treatment			
4	Transitional CRR rules	Tier 2	Tier 2	Tier 2
5	Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Individual and Consolidated	Individual and Consolidated	Individual and Consolidated
7	Instrument type	Tier 2 - Art 62	Tier 2 - Art 62	Tier 2 - Art 62
8	Amount recognised in regulatory capital (€/thousand)	2,752	376,733	214,837
9	Nominal amount of instrument	25,000,000	500,000,000	500,000,000
9a	Issue price	100.00%	99.01%	99.679%
9b	Redemption price	100.00%	100.00%	100.00%
10	Accounting classification	Liabilities - Fvo	Liabilities - Amortised cost	Liabilites - Amortised cost
11	Original date of issuance	20/07/00	09/09/10	30/11/05
12	Perpetual or dated	At maturity	At maturity	At maturity
13	Original maturity date	20/07/15	09/09/20	30/11/17
14	Issuer call subject to prior supervisory approval	No	No	No
15	Optional call date, contingent call dates and redemption amount	N/A "Tax Event" - at par	N/A "Tax Event" - at par	30/11/12 "Tax Event" - at par
16	Subsequent call dates, if applicable	N/A	N/A	N/A
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Fixed	Fixed	Floating
18	Coupon rate and any related index	9.72%	5.60%	Eur 3M + 100 bps
19	Existence of a dividend stopper	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
	Fully discretionary, partially discretionary or mandatory (in terms of timing) - reasons			
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem			
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	N/A	N/A	N/A
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation	Senior	Senior	Senior
36	Non-complaint transitioned features	No	No	No
37	If yes, specify non-compliant features			

N/A: The information does not apply to the instrument.

	Order No.	13	14	15
1	Issuer	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A.	Banca Monte dei Paschi di Siena S.p.A. (previously BAPV loan from ABN)
2	Unique identifier	XS0415922730	XS0503326083	Sub Loan
3	Governing law(s) of the instrument	Instrument: English Law. Subordination clauses: Italian law	Instrument: English Law. Subordination clauses: Italian law	Instrument: Dutch Law. Subordination clauses: Italian law
	Regulatory treatment			
4	Transitional CRR rules	Tier 2	Tier 2	Tier 2
5	Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Individual and Consolidated	Individual and Consolidated	Individual and Consolidated
7	Instrument type	Tier 2 - Art 62	Tier 2 - Art 62	Tier 2 - Art 62
8	Amount recognised in regulatory capital (€/thousand)	417,306	364,700	142,169
9	Nominal amount of instrument	500,000,000	500,000,000	400,000,000
9a	Issue price	100.00%	99.01%	100.00%
9b	Redemption price	100.00%	100.00%	100.00%
10	Accounting classification	Liabilities - Amortised cost	Liabilities - Amortised cost	Liabilities - Amortised cost
11	Original date of issuance	04/03/09	21/04/10	10/10/06
12	Perpetual or dated	At maturity	At maturity	At maturity
13	Original maturity date	04/03/19	21/04/20	10/10/16
14	Issuer call subject to prior supervisory approval	No	No	Yes
15	Optional call date, contingent call dates and redemption amount	N/A "Tax Event" - at par	N/A "Tax Event" - at par	10/10/11 "Tax Event" - at par "Regulatory Event" - at par
16	Subsequent call dates, if applicable	N/A	N/A	Each interest payment date
	Coupons / dividends			
17	Fixed or floating dividend/coupon	Fixed	Fixed	Floating
18	Coupon rate and any related index	7.00%	5.00%	Eur 3M + 280 bps
19	Existence of a dividend stopper	No	No	No
20a	Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
	Fully discretionary, partially discretionary or mandatory (in terms of timing) - reasons			
20b	Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21	Existence of step up or other incentive to redeem			
22	Noncumulative or cumulative	Noncumulative	Noncumulative	Noncumulative
23	Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24	If convertible, conversion trigger(s)	N/A	N/A	N/A
25	If convertible, fully or partially	N/A	N/A	N/A
26	If convertible, conversion rate	N/A	N/A	N/A
27	If convertible, mandatory or optional conversion	N/A	N/A	N/A
28	If convertible, specify instrument type convertible into	N/A	N/A	N/A
29	If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30	Write-down features	N/A	N/A	N/A
31	If write-down, write-down trigger(s)	N/A	N/A	N/A
32	If write-down, full or partial	N/A	N/A	N/A
33	If write-down, permanent or temporary	N/A	N/A	N/A
34	If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
35	Position in subordination hierarchy in liquidation	Senior	Senior	Senior
36	Non-complaint transitioned features	No	No	No
37	If yes, specify non-compliant features			

N/A: The information does not apply to the instrument.

Below is the quantitative information on Own Funds, reported according to the Transitional Own funds disclosure template provided for in the EBA's instructions. (Attachment VI of the European Commission's (EU) Implementing Regulation No. 1423/2013.

Tab. 3.1.1 - Transitional own funds disclosure template

	Common Equity Tier 1 (CET1) capital: instruments and reserves	(A) - Amount at disclosure date	C) - Amounts subject to pre-regulation (EU) no. 575/2013 treatment or prescribed residual Amount of regulation (EU) No 575/2013
1	Capital instruments and the related share premium accounts	12,297,339	
	of which: Paid-up Capital	*12,295,049*	
2	Retained earnings	-200,541	
3	Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)	-557,915	
4	Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1	-	
	Public sector capital injections grandfathered until 1 January 2018	1,071,000	
5	Minority Interests (amount allowed in consolidated CET1)	-	
5a	Independently reviewed interim profits net of any foreseeable charge or dividend	-	
6	**Common Equity Tier 1 (CET1) capital before regulatory adjustments**	**12,609,883**	
	Common Equity Tier 1 (CET1) capital: regulatory adjustments		
7	Additional value adjustments	-61,317	
8	Intangible assets (net of related tax liability)	-511,727	
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met)	-66,002	-264,009
11	Fair value reserves related to gains or losses on cash flow hedges	184,473	
12	Negative amounts resulting from the calculation of expected loss amounts		
14	Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	-124,338	
16	Direct and indirect holdings by an institution of own CET1 instruments		
17	Holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution	-	
18	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above the 10% threshold and net of eligible short positions)		
19	Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions)		
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in 38 (3) are met)		
22	Amount exceeding the 15% threshold	-40,844	-264,022
23	*of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities*	*-29,951*	*-119,806*
25	*of which: deferred tax assets arising from temporary differences*	*-10,893*	*-144,217*
25a	Losses for the current financial year	-1,068,578	-4,274,314
26	Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment	-596,677	
26a	Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468	-10,114	
	Of which: unrealised losses on UCITS	1,084	
	Of which: unrealised losses on EU government bonds	164,334	
	Of which: unrealised losses on Debt instruments	-66,335	
	Of which: unrealised losses on Investments	-10,710	
	Of which: unrealised losses on Investments valued at equity	*-97,217*	
	Of which: unrealised losses on trading actions	-303	
	Of which: unrealised losses on exchange rate differences	*-967*	
26b	Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR	88,014	
27	Qualifying AT1 deductions that exceed the AT1 capital of the institution	-3,795,262	
28	**Total regulatory adjustments to Common equity Tier 1 (CET1)**	**-6,002,373**	
29	**Common Equity Tier 1 (CET1) capital**	**6,607,510**	

	Additional Tier 1 (AT1) capital: instruments	(A) - Amount at disclosure date	C) - Amounts subject to pre-regulation (EU) no. 575/2013 treatment or prescribed residual Amount of regulation (EU) No 575/2013
30	Capital instruments and the related share premium accounts	217.073	
31	*of which: classified as equity under applicable accounting standards*	*189,158*	
32	*of which: classified as liabilities under applicable accounting standards*	*27,915*	
33	Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1	321,347	
	Public sector capital injections grandfathered until 1 January 2018	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	-	
35	*of which: instruments issued by subsidiaries subject to phase out*	-	
36	**Additional Tier 1 (AT1) capital before regulatory adjustments**	**538,421**	
	Additional Tier 1 (AT1) capital: regulatory adjustments	-	
37	Direct and indirect holdings by an institution of own AT1 Instruments	-	
38	Holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution	-	
39	Direct and indirect holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above the 10% threshold and net of eligible short positions)	-	
40	Direct and indirect holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above the 10% threshold net of eligible short positions)	-	
41	Regulatory adjustments applied to additional tier 1 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)	-	
41a	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013	-4,333,682	
	of which: Current financial year losses	*-4,274,314*	
	of which: Significant financial instruments	*-59,368*	
41b	Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013	-	
	of which: Residual amount of the AT1 instruments of financial sector entities where the institutionhas a significant investment in those entities	-	
41c	Amount to be deducted from or added to Additional Tier 1 capital with regard to additional filters and deductions required pre-CRR	3,795,262	
42	Qualifying T2 deductions that exceed the T2 capital of the institution	-	
43	**Total regulatory adjustments to Additional Tier 1 (AT1) capital**	**-538,421**	
44	**Additional Tier 1 (AT1) capital**	**-**	
45	**Tier 1 capital (T1 = CET1 + AT1)**	**6,607,510**	

	Tier 2 (T2) capital: instruments and provisions	(A) - Amount at disclosure date	C) - Amounts subject to pre-regulation (EU) no. 575/2013 treatment or prescribed residual Amount of regulation (EU) No 575/2013
46	Capital instruments and the related share premium accounts	3,182,232	
47	Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2	-	
	Public sector capital injections grandfathered until 1 January 2018	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	
49	*of which: instruments issued by subsidiaries subject to phase out*	-	
50	Credit risk adjustments	174,843	
51	**Tier 2 (T2) capital before regulatory adjustments**	**3,357,075**	
	Tier 2 (T2) capital: regulatory adjustments	-	
52	Direct and indirect holdings by an institution of own T2 instruments and subordinated loans	-5,867	
53	Holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution	-	
54	Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions)	-	
54a	*Of which new holdings not subject to transitional arrangements*	-	
54b	*Of which holdings existing before 1 January 2013 and subject to transitional arrangements*	-	
55	Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions)	-68,516	
56	Regulatory adjustments applied to tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)	-	
56a	Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) No 575/2013	-59,368	
		-59,368	
56b	Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013	-	
	of which: Residual amount of the AT1 instruments of financial sector entities where the institutionhas a significant investment in those entities	-	
56c	Amount to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre CRR	69,284	
	Of which: unrealised gains	*69,284*	
57	**Total regulatory adjustments to Tier 2 (T2) capital**	-64,467	
58	**Tier 2 (T2) capital**	**3,292,608**	
59	**Total capital (TC = T1 + T2)**	**9,900,118**	

	Capital ratios and buffers	(A) - Amount at disclosure date
60	**Total risk weighted assets**	**76,220,350**
61	Common Equity Tier 1 (as a percentage of risk exposure amount)	8.67%
62	Tier 1 (as a percentage of risk exposure amount)	8.67%
63	Total capital (as a percentage of risk exposure amount)	12,99%
64	Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or O-SII buffer), expressed as a percentage of risk exposure amount)	7.00%
65	*of which: capital conservation buffer requirement*	*2.50%*
67a	*of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer*	
68	Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	4.17%
	Amounts below the thresholds for deduction (before risk weighting)	
72	Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	62,505
73	Direct and indirect holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	919,278
74	Empty set in the EU	
75	Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)	952,131
	Applicable caps on the inclusion of provisions in Tier 2	
76	Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	981,903
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	174,843
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 and 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase out arrangements	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	
82	Current cap on AT1 instruments subject to phase out arrangements	401,684
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	
84	Current cap on T2 instruments subject to phase out arrangements	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	

Tab. 3.1.2 – Reconciliation of shareholders' equity and the Common Equity Tier 1

Items	31.12.2014
Group Equity	5,965,027
Minority Equity	23,625
Net Assets of the Balance Sheet	**5,988,652**
Net Assets after distribution to shareholders	
Adjustments for instruments computable in AT1 or T2	
- Capital share computable in AT1	-189,158
- Minority interests computable	-23,625
- Own shares included in the regulatory adjustments	
- Other components non computable in regime	181,471
Common Equity Tier 1 (CET1) before the regulatory adjustments	**5,957,340**
Regulatory adjustments (including adjustments of the transitional period)	650,169
Common Equity Tier 1 (CET1) net of regulatory adjustments	**6,607,509**

4. Capital requirements

The capital management activity involves all the policies and choices necessary to define the size of capital and the optimum combination between different alternate capitalization instruments, so as to ensure that the amount of capital and related ratios are consistent with the risk profile assumed observe regulatory requirements. From this standpoint, Group-wide capital management has become increasingly more fundamental and strategic, taking into account that the quality and sizing of capital resources of the individual companies belonging to the Group are defined as part of the more general objectives of the Group itself.
Following the implementation of the "Basel 3" regulatory framework, Pillar 1 was strengthened through a more harmonised definition of capital as well as higher capital requirements. In the face of more stringent capital requirements that more accurately reflect the potential risk of certain activities (e.g. securitisations and trading book), a definition of higher quality capital has been added, essentially focused on common equity. Capital reserves are added to this definition, which function is to conserve primary capital, provide counter-cyclical buffers, and hedge against greater losses for systemically important financial institutions. These reserves are envisaged at the discretion of Supervisory Authorities, net of the mandatory capital conservation buffer of 2.5%.
In addition to the system of capital requirements aimed at covering credit, counterparty, market and operational risk, there is now a plan to introduce leverage caps (including off-balance sheet exposures) as a backstop to capital requirements based on risk and to reduce excessive leverage across the system.
"Basel 3" also introduces new liquidity risk monitoring requirements and tools which focus on short-term liquidity resilience (Liquidity Coverage Ratio - LCR) and longer term structural balance (Net Stable Funding Ratio - NSFR) as well as providing standards for liquidity risk management and monitoring at both individual and system-wide level.
The introduction of Basel 3 regulations is subject to a transition period that extends the full application of the rules to 2019 (2022 for the phase-out of certain capital instruments) and during which the new rules will be applied in an increasing proportion.
Regulatory capital, an element of Pillar 1, is therefore calculated according to Basel 3 rules implemented in Europe through a comprehensive body of regulations, consisting of the Capital Requirements Regulation (CRR), European Regulation no. 575/2013, and related integrations, by the Capital Requirements Directive (CRD IV), by Regulatory Technical Standards and Implementing Technical Standards issued by the EBA, and by supervisory instructions issued by Bank of Italy (specifically, Circular nos. 285 and 286).

Minimum capital requirements

The minimum capital requirements for 2014 are as follows:

- CET1 ratio of at least 4.5% of the Group's total risk exposure;

- AT1 ratio of at least 5.5% of the Group's total risk exposure; in 2015 the threshold will increase to 6%
- Total Capital ratio of at least 8% of the Group's total risk exposure.

Additionally, the new regulations envisage that banks must have the following reserves:

- capital conservation buffer - aimed at conserving the minimum level of regulatory capital during difficult periods in the market, through the allocation of high quality capital in periods in which there are no market tensions. This reserve is mandatory and must be at least 2.5% of the Bank's total risk exposure. The reserve consists of CET1 capital;
- countercyclical capital buffer - aimed at protecting the banking sector in phases of excessive growth in loans. The buffer provides for the accumulation of CET1 capital during phases of rapid growth in the credit cycle, which can then be used to absorb losses in the downward phase of the cycle. As opposed to the capital conservation buffer, the countercyclical buffer is imposed only during periods of loan growth and is calculated according to pre-established criteria. Supervisory Authorities have not yet defined the amount of this reserve;
- G-SII buffer for global systemically important banks and O-SII buffer for other systemically important entities - impose higher capital requirements on those entities based on their systemic relevance, at a global or national level, which pose greater risks for the financial system and for which a crisis could have impacts on contributors. The Group falls under the Basel Committee's definition of systemically important banks, required to publish indicators according to the established times and methods. Hence, from 2016, the Group will be subject to additional loss absorbency requirements, the extent of which will be defined by the Bank of Italy.

Liquidity indicators and Leverage Ratio

With reference to the Liquidity Coverage Ratio, the observation period by the Supervisory Authorities began in March 2014, which precedes the official introduction of this ratio in January 2015. Also in the case of the Net Stable Funding Ratio, the observation period started on 31 March 2014. These two ratios and the associated minimum requirements will become effective 1 January 2018, upon authorisation of the European Council and Parliament.

The Leverage Ratio is calculated with a denominator that is based on the assets not risk weighted at the end of the quarter. The indicator will become binding in 2018, the transition observation phase will take place from 2014 until 31 December 2017. To date, the Supervisory Authorities have not yet determined the minimum Leverage Ratio thresholds. However, as of 1 January 2015, banks are also required to publicly disclose their Basel 3 leverage ratio on a consolidated basis in addition to existing disclosure obligations. Banks will be required to comply with these requirements from the date of publication of their first set of financial statements on or after 1 January 2015. In order for a bank to meet this additional requirement, a minimum of three items must be disclosed on a quarterly basis: (i) the numerator (Tier 1 capital); (ii) the denominator (exposure measure); and (iii) the Basel III leverage ratio.

Capital adequacy

As to the definition of regulatory capital requirements, in June 2008 the Montepaschi Group was authorised to use the Advanced Internal Rating Based (AIRB) models for the measurement of capital requirements against credit risk in the retail and corporate portfolios and the Advanced Measurement Approach (AMA) for operational risk.

The key regulatory impacts on capital requirements are associated with the following elements:

- increase in capital requirements associated with deferred tax assets (DTAs) that are not based on future profitability and that derive from temporary differences, which can be transformed into credits and therefore included in RWA with a weight of 100%;
- increase in capital requirements associated with financial equity investments and DTAs (that cannot be transformed into credits) not deducted from CET1 as a result of the exemption, and therefore included in RWA with a weight of 250%;
- increase in the capital requirements associated with the introduction of the Credit Value Adjustment (CVA) as part of counterparty risk;
- decrease of the requirement for credit risk for exposures with SMEs that, within certain limits, benefit from a discount of around 24% (SME Supporting Factor);
- elimination of the inclusion of the capital requirement associated with Basel 1 Floor as, according to the new rules, it is no longer expressed in terms of a higher requirement, but rather in terms of a restriction on regulatory capital; this minimum amount of capital to be held cannot be less than 85% of what would be necessary to have a Total Capital ratio of 8%, considering the Basel 1 requirement.

The following contains information on capital adequacy reported by the Group according to the new “Basel 3” templates.

The figure at 31/12/2013 was adjusted again compared to the pro-forma Bis3 31/12/2013 data published in the Quarterly Report of March 2014, to provide a like-for-like comparison with 31/12/2014 since some instructions for the regulatory treatment of certain items were incorporated during the year. In particular, the adjustment regarded, in terms of capital, the elimination of the positive filter on the negative AFS Reserve on Italian government bonds connected to the “Alexandria” transaction with Nomura, the impact deriving from the treatment of treasury shares included in UCITS funds (“Lookthrough”); the method for calculating the CET1 exemption for the determination of deductions to be made to capital and the consolidation of the vehicle “Patagonia” (the latter impacted only at the Tier 2 level and to a non-material extent with respect to RWAs). In terms of RWAs, the value differs due to the indirect effects of the CET1 exemptions mechanism. For further information, please refer to “Part F” of the Notes to the Financial Statements.

Tab. 4.1 – Capital requirements and Regulatory capital ratios

Regulatory Capital Requirements	dec-14	dec-13*
Credit Risk	**5,001,640**	**5,442,612**
Standard Approach	2,670,400	2,975,116
Advanced IRB Approach	2,331,240	2,467,496
Market Risks	**289,142**	**504,621**
Standardised Approach	286,106	504,621
Internal Models	-	-
Concentration Risk	3,036	-
Operational Risk	**708,267**	**659,407**
Foundation Approach	20,212	29,343
Standardised Approach	-	-
Addvanced Approach	688,055	630,064
CVA Risk	**98,579**	**93,313**
Originary Exposure Methos (OEM)	-	-
Standardised Approach	98,579	93,313
Advanced Approach	-	-
Settlement Risk	**-**	
Regulatory Capital Requirements	6,097,628	6,699,953
Risk-weighted assets	**76,220,350**	**83,749,413**
CET1 Capital Ratio	**8.67%**	**10.45%**
Tier1 Capital Ratio	**8.67%**	**10.45%**
Total Capital ratio	**12.99%**	**14.66%**

** Data recalculated according to BIS 3 only for comparative purposes*
The capital requirement for the counterparty risk amounts to € 261,235 / thousand, and is calculated, as well as on the trading portfolio also on the banking book. This requirement is shown, in the hands of the individual regulatory portfolios of standard methodology and the advanced IRB methodology. The capital requirements included in the specific risk in the face of securitization positions included in the banking book, amounted to 13,093 (in thousands of euros) for the year 2014.

The RWA resulting from the introduction of the new capital rules was quantified by applying the transition requirements. The improvement in capital ratios was also enhanced by the considerable reduction in RWAs (EUR -7,529 mln compared to pro-forma 31/12/2013), standing at approx. EUR 76.2 bn. The reduction is due to the significant decrease in requirements against credit and counterparty risk, amounting to roughly –EUR 441 mln (-EUR 5,512 mln in terms of RWAs). Specifically, abosorption of credit risk declined due to the reduction of performing loans (also as a result of reclassifications made during the AQR). RWAs also reduced as a result of a reduction in requirements against market risk by approx. EUR - €215 mln (- EUR 2,693 mln in RWAs) due to portoflio optimisation and the decrease in operating levels. This trend was partially offset by the increase in CVA Risk +EUR 5.3 mln vs Dec. 2013 (+5.6%) and the increase in requirements linked to financial investments and DTAs as a result of the higher provisions regonised in the Balance Sheet owing to the AQR.

5. Credit Risk

5.1 Credit Risk: general disclosure

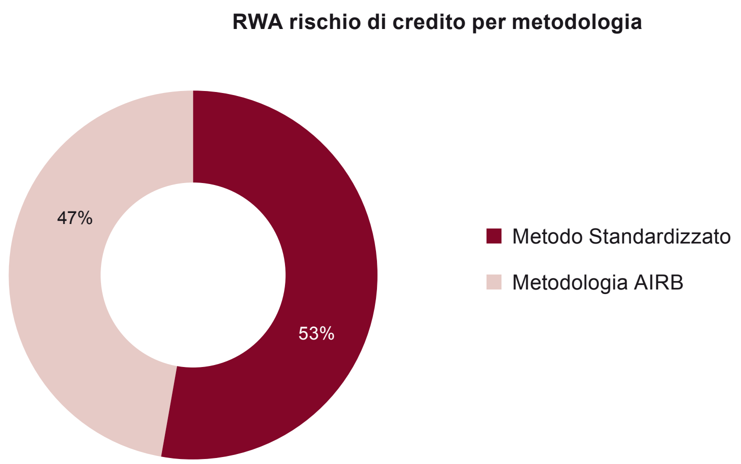
The MPS group gives special attention to the management and measurement of Credit Risk, which represents the greatest risk to which the Group is exposed, accounting for approximately 82% of total capital requirements. The main objective of the Credit Risk Management function is to promote a culture of "responsible lending" within the Group and pursue a sustainable growth in lending transactions that is in line with risk appetite and value creation. The Group's strategies in the area of risk management are aimed at limiting the economic impact from defaulting loans and containing the cost of credit. The credit risk management function is involved in defining credit policy guidelines by identifying the customer segments with greater opportunities from risk-return perspective, promoting risk diversification, limiting the concentration of risk exposure in single business groups/sectors and geographical areas. The function also defines the supports available to Credit disbursement strategies. The use and allocation of ratings is crucial, since they are the synthetic measurement of a customer's creditworthiness both during the loan disbursement and monitoring processes. This forms the basis of the preliminary procedure that is followed as a loan proposal is processed and then subsequently monitored. The assignment of a rating to each borrower means that borrowers can be classified into actual levels of risk and that both an overall or broken-down objective assessment of risk components may be made; this system, therefore, provides the basis of information for supporting both strategic decisions and the ordinary management of risk positions. Credit policy guidelines are thus provided by the sales network according to customer segments, rating categories, business sector, Regional Area, loan type and types of collateral used.

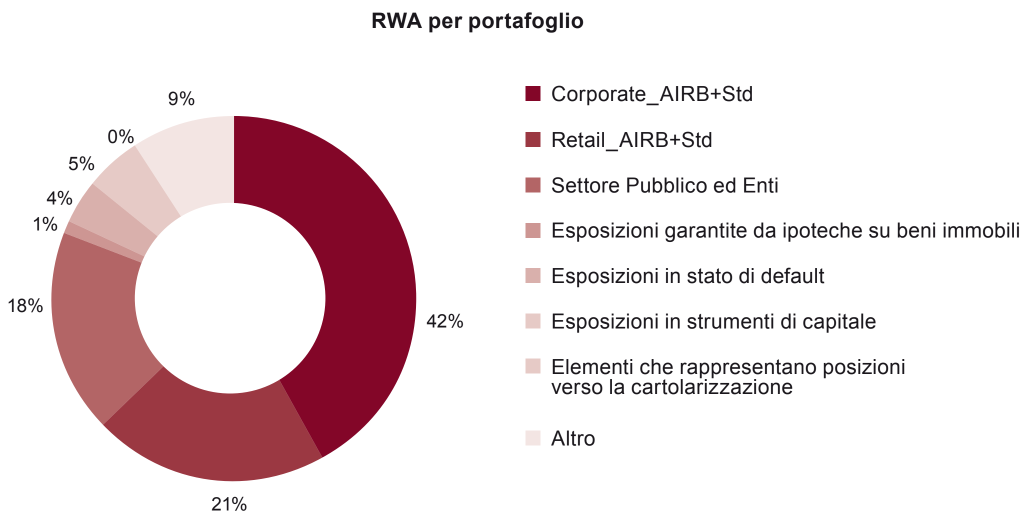
In addition, operational guidelines are structured into quantitative and qualitative objectives to develop and reclassify the loan portfolio, according to business sector and regional units. The Credit Risk Management function is also involved in the monitoring phase and verifies that the Network Structures achieve their goals of credit quality and alignment with established benchmarks, identifying the appropriate remedial actions to be implemented, reviewing objectives and, on a more general level, analysing trends in the quality of the loan portfolio in terms of market/product/customer segment and related causes. For a detailed description of the tasks of the Credit Risk function, *see* Chapter 1.

As concerns capital requirements, for credit risks the Group uses the Advanced Internal Rating Based (AIRB) method with reference to the "Credit Exposures to Retail" and "Credit Exposures to Entities" regulatory

portfolios. The scope of application of the AIRB method currently includes the Parent Company Banca MPS, MPS Capital Services Banca per le Imprese and MPS Leasing & Factoring. For the remaining portfolios and Group entities, capital requirements relative to credit risks are calculated according to the standard method.
RWAs by credit risk show an almost-equal breakdown between Standard approach and advanced approach (Std 53% vs. AIRB 47%).

An analysis by type of exposure reveals that 63% of Credit Risk refers to the Corporate and Retail portfolios. The remaining 37% is mainly concentrated in the Public Sector and Institutions (18%).





Tab. 5.1.1 – EAD and RWA overview between Credit Risk and Counterparty Risk

	dec-14				dec-14		dec-13	
	EAD Credit Risk	RWA Credit Risk	EAD Counterparty Risk	RWA Counterparty Risk	EAD Total	RWA Total	EAD Total	RWA Total
Standard Approach								
Standard Approach Total	**70,002,370**	**30,603,315**	**10,037,650**	**2,776,680**	**80,040,020**	**33,379,995**	**85,005,107**	**37,188,948**
IRB Approach								
IRB Approach Total	**116,829,344**	**28,657,796**	**902,840**	**482,703**	**117,732,184**	**29,140,499**	**120,915,000**	**30,843,700**
Total	**186,831,714**	**59,261,112**	**10,940,490**	**3,259,383**	**197,772,204**	**62,520,494**	**205,920,107**	**68,032,648**

The following table shows a breakdown of exposures and RWAs by approach (Standard/AIRB) and by regulatory portfolio.

Tab. 5.1.2 – Exposure and RWA Distribution of Credit and Counterparty Risk

Standard Approach Regulatory Portfolio	EAD	RWA
Exposures to central governments and central banks	35,006,699	6,258,802
Exposures to regional governments and local authorities	2,135,614	426,836
Exposures to public sector entities	490,029	378,596
Exposures to Multi-lateral development banks	34,291	-
Exposures to International Organisations	-	-
Exposures to Institutions	15,990,718	4,003,640
Exposures to Corporates	8,121,044	7,921,377
Retail Exposures	3,371,548	2,489,700
Exposures secured by mortgages on immovable property	1,698,495	680,286
Exposures in Default	2,350,096	2,775,664
Exposures associated with particularly high-risk	51,179	76,768
Exposures in the form of covered bonds	986,309	199,813
Exposures to institutions and corporates with a short-term credit assessment	-	-
Exposures to UCITs	871,192	871,192
Equity Exposures	1,745,153	2,897,361
Other Exposures	7,133,564	4,236,295
Items representing securitization positions	54,088	163,665
Standard Approach Total	**80,040,020**	**33,379,995**
IRB Approach		
Exposures to or secured by corporates:	50,358,660	18,348,417
- Exposures to or secured by corporates - SMEs	32,276,311	9,396,770
- Exposures to or secured by corporates - Other companies	18,082,349	8,951,647
Retail Exposures:	67,373,524	10,792,082
- Retail Exposures Secured by real estate - SMEs	10,486,140	3,014,598
- Retail Exposures Secured by real estate - Individuals	30,106,751	2,671,257
- Qualifying revolving Retail Exposures	8,868	968
- Other retail Exposures - SMEs	21,969,599	4,722,059
- Other retail Exposures - Individuals	4,802,167	383,200
IRB Approach Total	**117,732,184**	**29,140,499**
Credit and Counterparty Risk Total	**197,772,204**	**62,520,494**

5.2 Credit Risk: Standard approach

IThe Montepaschi Group uses the following official rating agencies for legal entities not subject to airb validation as well as for statutory portfolios, for which the advanced internal rating system to calculate capital absorption on credit risk is not used, to measure the level of reliability of different borrowers:

- Standard & Poor's;
- Moody's Investor Service;
- Fitch Rating.

When determining capital requirements, it should be noted that if there are two evaluations of the same customer, the more conservative one is adopted. In the case of three evaluations, the intermediate is used.

At present the standardised approach is applied to all portfolios and entities of the Group with the exception of the portfolios, Exposures to corporates and retail exposures, belonging to the following entities:

- *Banca Monte dei Paschi di Siena*
- *MPS Capital Services Banca per le Imprese*
- *MPS Leasing & Factoring*

for which the advanced IRB model is adopted, details of which are described in paragrapf 5.5.

Portfolios and official ratings	ECA/ECAI	Rating haracteristics (a)
Exposures to governments and central banks Exposures to multilateral development banks	✓ Standard & Poor's Moody's Investor Service Fitch Ratings	Solicited/Unsolicited
Exposures to International organisations Exposures to corporates and other persons Exposures to undertakings for collective investment in transferable securities (UCITS)	✓ Standard & Poor's Moody's Investor Service Fitch Ratings	Solicited
Securitization positions with short-term ratings Securitization positions other than those with short term rating	✓ Standard & Poor's Moody's Investor Service Fitch Ratings	NA

(a)
- ***solicited rating:*** *a rating assigned for a fee following a request from the entity evaluated. Ratings assigned without such a request shall be treated as equivalent to solicited ratings if the entity had previously obtained a solicited rating from the same ECAI;*
- ***unsolicited rating:*** *a rating assigned without a request from the entity evaluated and without payment of a fee.*

The table below shows the details of the banking Group's exposures subject to credit risk – standardised approach, determined according to the rules of Prudential Supervision and including the effects from risk mitigation techniques (netting agreements, guarantees, etc.).

The quantitative disclosures in this Section complement those provided in the section on Risk mitigation techniques. In fact, each regulatory portfolio provided for by regulations under the standardised approach is broken down as follows:

– amount of on- and off-balance exposures, "without" the risk mitigation (Exposure before CRM), which does not take into account the decrease in exposure arising from application of collateral and guarantees; in the case of guarantees, which transfer risk in respect of the guaranteed portion, reference is made to the guarantor's regulatory portfolios and weightings, while as to the residual exposure, reference is made to the guaranteed party's information;

– amount of the same exposures "with" the risk mitigation effect (Exposure after CRM) , i.e. net of the guarantees mentioned in the previous point. The difference between exposures "with" and "without" credit risk mitigation thus represents the amount of approved guarantees, disclosed also in the section on Risk mitigation techniques. The below information is listed in the "with" and "without" credit risk mitigation columns and credit risk mitigation techniques.

Tab. 5.2.1 – Standard approach: Ante and Post CRM Exposure Value

Regulatory Portfolio (Standard Approach)	Ante CRM Exposure	Post CRM Exposure	Credit Risk Mitigation Techniques
Exposures to central governments and central banks	35,049,415	35,049,415	-
Exposures to regional governments and local authorities	2,291,200	2,291,200	-
Exposures to public sector entities	730,992	717,798	-13,194
Exposures to Multi-lateral development banks	64,291	64,291	-
Exposures to International Organisations	-	-	-
Exposures to Institutions	64,147,038	23,235,393	-40,911,645
Exposures to Corporates	12,372,542	11,316,455	-1,056,087
Retail Exposures	3,837,470	3,804,605	-32,865
Exposures secured by mortgages on immovable property	1,703,122	1,702,324	-798
Exposures in Default	2,770,633	2,765,456	-5,177
Exposures associated with particularly high-risk	51,179	51,179	-
Exposures in the form of covered bonds	986,309	986,309	-
Exposures to institutions and corporates with a short-term credit assessment	-	-	-
Exposures to UCITs	1,057,796	1,051,132	-6,663
Equity Exposures	1,745,153	1,745,153	-
Other Exposures	7,133,564	7,133,564	-
Items representing securitization positions	54,088	54,088	-
Standard Approach Total	**133,994,792**	**91,968,362**	**-42,026,430**

The Table shows the Banking Group's exposures reported by regulatory exposure classes and also contains off-balance sheet exposures relating to guarantees and commitments before the application of credit conversion factors (CCF).

The Table below provides the Banking Group's exposures reported by regulatory exposure classes and also contains off-balance sheet exposures relating to guarantees and commitments (including the margins available on lines of credit) following the application of credit conversion factors (CCF) required by the prudential regulations. The off-balance sheet exposures in relation to guarantees and commitments are disclosed side by side with the counterparty weighting factor. The exposure value shown in the tables of this section is stated net of adjustments in according to the prudential regulations.

The table below provides the breakdown of exposures with" credit risk mitigation by credit quality step and by exposure class.

Tab. 5.2.2 – Standard approach: Distribution in classes of creditworthiness (post CRM)

Standard Portfolios	0%	fino a 20%	35%	50%	75% - 100%	150%	225% - 250%	1250%	Total
Exposures to central governments and central banks	29,921,424	17	-	39,690	4,249,979	-	795,590	-	35,006,699
Exposures to regional governments and local authorities	-	2,135,614	-	-	-	-	-	-	2,135,614
Exposures to public sector entities	-	139,289	-	-	350,738	2	-	-	490,029
Exposures to Multi-lateral development banks	34,291	-	-	-	-	-	-	-	34,291
Exposures to International Organisations	-	-	-	-	-	-	-	-	-
Exposures to Institutions	82,625	12,208,210	-	3,498,353	195,792	5,738	-	-	15,990,718
Exposures to Corporates	14,912	54,749	-	158,211	7,849,099	44,074	-	-	8,121,044
Retail Exposures	-	-	-	-	3,371,548	-	-	-	3,371,548
Exposures secured by mortgages on immovable property	-	-	984,128	707,292	7,076	-	-	-	1,698,495
Exposures in Default	962	-	-	-	1,496,073	853,061	-	-	2,350,096
Exposures associated with particularly high-risk	-	-	-	-	-	51,179	-	-	51,179
Exposures in the form of covered bonds	-	977,804	-	8,505	-	-	-	-	986,309
Exposures to institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-	-
Exposures to UCITs	-	-	-	-	871,192	-	-	-	871,192
Equity Exposures	-	-	-	-	977,014	-	768,139	-	1,745,153
Other Exposures	974,638	2,402,991	-	516	3,755,382	38	-	-	7,133,564
Items representing securitization positions	-	-	-	-	-	-	49,994	4,094	54,088
Total at 31/12/2014	**31,028,850**	**17,918,674**	**984,128**	**4,412,567**	**23,123,891**	**954,093**	**1,613,723**	**4,094**	**80,040,020**

The Table shows the Banking Group's exposures reported by regulatory exposure classes and also contains off-balance sheet exposures relating to guarantees and commitments following the application of credit conversion factors (CCF).

5.3 Credit Risk: use of the IRB approach

AIRB Authorization

With decree no. 647555 of 12 June 2008, the bank of Italy authorised the Montepaschi Group to use advanced internal rating based (AIRB) systems to calculate the capital requirements for credit and operational risk. In particular, whereas the Montepaschi Group uses the standardised approach ratios for Exposure at default (EAD) pending validation by the Supervisory Authorities, the Group is instead authorised to use:

- Internal Probability of Default (PD) estimates, for the portfolio of exposures to corporates and retail exposures;
- internal Loss Given Default (LGD) estimates for the portfolio of exposures to corporates and retail exposures.

For portfolios other than those mentioned above, the standardised approach will be used and applied according to the roll-out plan submitted to the Supervisory authorities. As for legal entities, the scope of application of the authorised approaches shall be the following:

- AIRB: Banca Monte dei Paschi di Siena, MPS Capital Services, Banca Antonveneta, MPS Leasing & Factoring;
- the remaining legal entities of the Montepaschi Group use the standardised approach.

Internal rating system architecture

The Montepaschi Group began using internal rating systems for the measurement of credit risk in 2002. The first Probability of default (PD) models were developed for the small and medium-sized enterprises (SMEs) and Small businesses (SB) portfolios which still remain the “core business” of the Group; subsequently, rating models were also estimated for other types of exposure and a loss Given default (LGD) estimation model was implemented.

Finally, an Exposure at Default (EAD) estimation model was implemented and subsequently updated, as with other internal models pending validation by the Supervisory Authorities. The rating system has thus become, over time, one of the main elements of assessment for all units involved in the credit industry, both at Head Office level (risk management, chief Financial Officer, General management, risk committee, board of directors) and at outer level (credit management area, rating units and relationship managers). Thanks to the experience accumulated, the Montepaschi Group has decided to further invest in internal rating systems, starting, at the beginning of 2006, with the Basel II Project aimed at improving the existing internal procedures by adjusting them to the new prudential supervisory regulations for banks which came into force on January 1, 2007 with legislative decree no. 297 dated 27 December 2006. This project ended in 2008 with the authorisation from the bank of Italy to use advanced internal rating systems (AIRB) for PD and LGD with a view to calculating capital requirements for portfolios of "non-financial companies" and "retail exposures" for Banca Monte dei Paschi di Siena and MPS Capital Services. Over the following years, in line with an internal overall 'advancement plan', the MPS Group continued the process of refinement/ revision of its rating models for corporate and retail clients, leading it to obtain authorization by the Supervisory body (with decree of 25/08/2010) to use advanced internal rating based systems for the Group's new entity, "Banca Antonveneta" (acquired in 2008 and merged into Banca MPS in April 2013) and for Montepaschi Leasing & Factoring and BiverBanca by ruling of 06.07.2012. The latter was subsequently sold by the Group to Cassa di Risparmio di Asti and as of the end of 2012 is no longer part of the MPS Group.

Internal rating system description

The development of the internal rating systems involved the adoption of strict and advanced statistical methodologies in compliance with the requirements set out in the regulations; at the same time, models were selected in such a way as to make results consistent with the historical experience of the bank in credit management. Lastly, in order to optimise the proper use of these new instruments, the rating models were shared with a top-down approach – from risk management down to individual client managers by means of intense training.

Estimation of the LGD model was based on internal data relative to capital flows, recoveries and expenses actually incurred on positions transferred to the non-performing portfolio. Results obtained from model application were then compared with data recorded by MPS Gestione Crediti Banca, a company of the Group dedicated to the management and recovery of non-performing loans. The introduction of advanced rating systems in the credit process was an important cultural step forward which is now becoming a well-established practice for all business units of the Group. The main characteristics of the advanced rating systems are as follows:

- for all regulatory portfolios subject to validation, the rating is calculated with a counterparty-based approach for each individual borrower, in line with the accepted management practice which provides for the assessment of credit risk, both in the disbursement and monitoring phases;
- ratings are based upon a Group logic: each individual counterparty is assigned a single rating at banking Group level, based on the data set pertaining to all lending banks within the AIRB scope; there is one LGD reference definition for retail banks while there are different reference definitions for product companies;
- LGD reflects the economic (and not only the accounting) loss incurred; for this reason, LGD estimates must also include

the costs incurred for the recovery process and a time factor;

- the rating model segmentation is defined in such a way as to make the individual model clusters consistent with business objectives, credit process logics and regulatory portfolios set out in the regulations;
- loss given default is differentiated by type of loans and an LGD value is assigned at the level of each individual transaction;
- customer segmentation for LGD estimation and assignment follows the same logics as with the rating models; for clusters to acquire significance, segments were aggregated together under "retail" for retail exposures and "corporate" for exposures to non-financial corporates;
- the loss rate is differentiated by geographical area since historical and current recovery rates are different among Northern Italy, central Italy and Southern Italy and islands;
- loss on defaulted positions other than non-performing loans is estimated with a cure rate approach. With regard to counterparties whose exposures are administratively classified as Watchlist, restructured and Past due, the percentage of exposures reverting back to a performing status was calculated and used to adjust LGD estimated from NPL positions;
- changes in exposure after the first transition to default are included in the cure rate estimate;
- calculation of the final rating is differentiated by type of counterparty. The credit process envisages a level of in-depth analysis proportional to counterparty risk: the assessment of loan disbursements is based on a complex multi-level structure for medium-large corporate counterparties (SmE and large corporate (lc) segments), whose exposure and concentration risks are higher, and a simplified structure for Small business and retail clients;
- in line with this process, the final rating for SMEs and LC is the result of a number of different factors: statistical rating, qualitative rating, overrides and valuation of the 'economic group' which businesses belong to; for SB and retail counterparties the rating is calculated only on the basis of statistical factors;
- the rating has a 12-month internal validity period and is usually reviewed on a yearly basis, except for rating reviews following well-structured codified practices or that are brought forward on client managers' request or following serious counterparty deterioration.

The Montepaschi Group has adopted one master Scale for all types of exposures: this enables all units involved in credit management to immediately compare the risk level associated with different counterparties or portfolios; furthermore, the probabilities of default of internal rating classes were mapped against Standard & Poor's external rating scale so as to make internal risk measurements comparable to those available on the financial market.

Rating Class	PD	PD Class
AAA	0,01%	1
AA1	0,03%	
AA2	0,05%	
AA3	0,09%	
A1	0,13%	
A2	0,20%	2
A3	0,30%	
B1	0,46%	
B2	0,69%	3
B3	1,05%	
C1	1,59%	
C2	2,42%	
C3	3,99%	4
D1	6,31%	
D2	9,95%	
D3	16,03%	
E1	22,12%	5
E2	31,63%	
E3	45,00%	
Default	100,00%	6

The table shows a breakdown by PD band - with related central PDs - identified by the MPS Group in order to allow for a significant differentiation of credit risk.

Under prudential standards, the PD for the corporate segment cannot be below AA1 whilst for retail, the MPS Group has decided to assign a PD of at least A1 for prudential purposes.

The rating system development and monitoring activities are functionally assigned to risk management. The estimation procedure is carried out according to an internal development protocol to make sure that estimation activities are transparent and visible for the internal controls and auditing departments.

Risk Management and Internal Validation Function periodically carry out monitoring/backtesting analyses on the internal models to verify their performance stability over time. Should significant vulnerabilities emerge from the analyses, model fine-tuning or 'reestimation' procedures are put in place.

Montepaschi Group currently has 15 rating models (14 validated and one pending validation) and one LGD model (differentiated by geographical area, type of loan, type of guarantee, guarantee coverage ratio and exposure at default) for the measurement of risk in validated regulatory portfolios.

For the calculation of capital absorption against credit risk, the Montepaschi Group uses **internal rating systems** for the following regulatory classes:

- corporates,
- retail exposures.

Internal rating model for Corporates

PD models

For the estimation of PD models, the Montepaschi Group adopted a default-based methodology. Among the statistical techniques used in the estimation of models with dichotomous bad/good target variables, a logistic regression was selected, characterized by the optimal trade-off between statistical soundness and interpretability of results.

The "non-financial businesses" portfolio includes all balance-sheet and unsecured exposures to companies with registered offices in Italy and relating to the banks, Monte dei Paschi, Capital Services and MPS Leasing and Factoring.

The Montepaschi Group operates almost entirely in the domestic market and therefore, due to the low significance of foreign operations, it took the decision to exclude all exposures to foreign corporates from the application of advanced systems. The data source observation period for Corporate is 7 years (2007-2013).

Model segmentation

Corporate customers were segmented beforehand in order to obtain consistent clusters by risk profile. To this end, a size logic was used (based on the legal form of a company and its turnover) which appears to be consistent from both the statistical and operational point of view. Any information on turnover is obtained from the company balance sheet prepared in accordance with the Fourth EEC directive in relation to the last available annual report. The segment of Small businesses (one-man businesses and partnerships) consists of companies which are not subject to the obligation of preparing balance sheets for legal purposes; tax data are not currently used in the segmentation.

Definition of default

During the stage of development of the PD models, the following definition of default was used: defaulting counterparties are a sub-group of customers with an exposure (credit line granted or drawn) which, in an ordinary condition in a specific month of the year, shows at least one impairment anomaly within the following twelve months. The anomalies contained in the definition of default include nonperforming loans, watchlist loans, restructured loans. Past-due positions for a period in excess of 90 days are included as of 2006, the year from which the reporting of such positions became mandatory. Furthermore, the decision was taken to use an internal definition of past due, so called "technical", to identify instances not representative of a state of financial difficulty that is liable to generate an economic loss (option granted to banks by the regulations at issue), in line with client managers' actual business-based expectations of economic loss. The rules applied, and subjected to review in the course of last year, allowed a sub-set of alerts to be identified, involving vulnerabilities similar to other impairment states (particularly watchlist); the rationale adopted was aimed at integrating defaulting positions with positions which show no temporary anomaly but are characterised by aspects featuring in other states of impairment. The definition of 'technical past due loans' was used consistently for PD and LGD estimates. Defaulting positions are identified at MPS banking Group level.

Development stages of the rating models

Two main stages of development are envisaged for each rating model: score model estimate and calibration.

- **Score model estimate**

All information sources available are taken into account for the estimate of each rating model. A modular approach was adopted to maximise the prediction power of each information source, i.e. a (financial, internal trend, industry trend) standard module was estimated for each information source with the following determination of the final model as a combination of all modules. The information sources used for corporate models are the following:

- balance sheet reports,
- internal trend data,
- industry data (Central Credit Registers of the Bank of Italy and of trade associations).

As far as the balance sheet is concerned, a set of indicators covering all areas of inquiry contemplated by corporate financial analysis was determined, including: debt coverage, financial structure, liquidity, profitability, productivity, development. With reference to lending trend components, the variables normally used by the account managers for risk valuation were restated: types of use of loan forms, account movements, number of irregularities found. The variables are calculated for each type of loan (callable, self-liquidating, upon maturity etc.) and are determined at the Group level over a time horizon of 12/6/3 months. As for the internal practice, the stage of development follows all procedures contemplated by a statistical inquiry: determination of a development sample (70%) and a test sample (30%), fact-finding analyses and preliminary data treatment, univariate analyses, correlation analyses and short list determination, multivariate analyses, model selection and review of out of sample performances.

- **Calibration**

Calibration is a process for estimating the function which transforms the score models output into default probability, i.e. the probability that a counterparty is in default within one year. The approach used by the MPS Group was based on two main steps:

- Estimate of the anchor point. The *anchor point* determines the average PD used by the model;
- Calculation of the calibration function for adjustment of the scoring model parameters.

The calibration function essentially defines how expected PD will vary according to the model score. Calibration in fact envisages a new default rate (anchor point) and is therefore inseparable from the need to adjust the parameters of the scoring algorithm so as to enable this latter value to be calculated instead of the estimated value. The default rate of the sample should therefore be adjusted in order to take account of the preset target rate (anchor point).

To this end, the MPS Group has identified

a methodology, substantially based on the use of a 'calibration' function, whose final output is an intercept and slope value to be applied to the initial algorithm.
The anchor point represents the level of risk traditionally associated with the specific segment which the model is calibrated on.
It is calculated on the basis of the long term default rate and qualitative considerations the analyst deems appropriate to introduce.
The estimated calibration function is used to calculate the point-in-time PD which is subsequently mapped on the Montepaschi Group Master Scale; each counterparty is assigned a PD level corresponding to its rating class.

LGD models

"New regulations for the prudential supervision of banks", is the long term average of realised losses, weighted by the number of counterparties and not by exposure. The Group uses a work-out model based on historical evidence of sets of defaulting transactions with similar characteristics. The database used to estimate the parameter includes all balance-sheet and unsecured exposures relating to the banks within the scope of validation, that were classed as "non-performing" from 1997 to 2013, for which either the recovery process has terminated or, if still active, whose balance is zero or seniority exceeds 15 years. The relevant clusters for the estimates include the geographic area, type of customers, loans, exposures transitioning to a default state, guarantees and their percentage of coverage.

- **Model segmentation**

The Corporate segment includes all counterparties which have been segmented according to the rating model logics and can be defined as large corporates, NBFIs, SMEs, small businesses or small economic players.

- **Definition of default**

During the stage of development of the LGD model, the definition of default used was the same as the one for rating models: defaulting counterparties are a sub-group of customers with an exposure (credit line granted or drawn) which, in an ordinary condition in a specific month of the year, show at least one impairment anomaly within the following twelve months.

- **Development stages of the LGD model**

The LGD estimate includes three main stages: (i) the measurement of the loss rate actually registered in the history of each individual legal entity in relation to the nonperforming customers, (ii) the calculation of the LGD downturn, i.e. an indicator which takes account of the adverse phases of the economic cycle; (iii) the calculation of the LGD for all loan statuses other than non-performing loans.

- **Loss Rate for non-Performing Positions**

Realised collections minus the costs incurred with respect to defaulting exposures are compared to calculate the LGD rate actually observed on non-performing positions. Considering that reference is made to the registered economic loss, and not only to the accounting loss, all movements are discounted as of the date the loan is classified as non-performing. The interest rate used for discounting is the risk free rate plus an appropriate spread which remunerates the opportunity cost of each bank resulting from the non-use of the capital not repaid by the customer. As provided for by the regulations, a lower limit of 0% is set since the average LGD cannot be negative.

- **LGD Downturn**

The relation between collection rates and default rates was analysed to determine the adjustment to be made to the LGD estimates in case of a possible downturn of the economic cycle; once a negative relation between the two series was ascertained, a regression model was clearly formulated between collection rates and macroeconomic variables. Once the collection rates of expansionary and recessive cycles are determined, the downturn LGD is calculated as long-term default-weighted average, suitable for the recessive phases of the economic cycle.

- **Total LGD**

The estimated loss rates on defaulting positions other than non-performing loans starts from the estimated cure rate, i.e. the percentage of Watchlist loans, restructured loans, or Past due loans reverting to performing loan status. All positions included in the rating model calibration population that became defaulted within the analysis period were selected for this purpose. A weighted average of the downturn LGD was calculated, using the cure rates multiplied by the probabilities of default as weights, to determine the LGD rates for the different statuses of default. The LGD to be applied to all loan transactions of performing customers was determined by using the calibration clusters of the rating models.

Internal rating model for Retail exposures

PD models

A default-based methodology has also been adopted for “retail exposures”. The portfolio includes all balance-sheet and unsecured exposures relating to loans granted by the banks, Monte dei Paschi, MPS Capital Services and MPS Leasing & Factoring to retail customers (natural persons or joint co-obligations of natural persons). The data source observation period for the estimation of PD is 5 years (2009-2013).

- **Model segmentation**

The retail portfolio was segmented drawing a distinction between jointly liable individuals and individual natural persons. The criteria were selected on the basis of the risk profile associated to the cluster and internal historical records.

- **Definition of default**

The Group used the definition of default adopted for the corporate models also in relation to the PD models applied to the portfolio of retail exposures.

- **Development stages of the rating models**

Following on from what was previously reported, only the specific features are shown for Retail models, which have been developed and calibrated using the same methods applied for Corporate models.

For the Retail segment, the main sets of information regarding developments are those relating to loans granted by the Group (overdraft facilities, mortgages and small loans) and to the personal data available on the Customer and related parties.

LGD models

The LGD model for retail exposures includes the stages contemplated for the corporate model. The comments on the estimate data base are only in relation to the retail segment and the cure rate estimate population was the calibration population of rating models.

Following are the main actions implemented over recent years.

In 2012, the MPS Group performed a full re-assessment of its corporate and retail models with a view to developing the segmentation of corporate models and aligning all models with the new regulatory definition of default which, as of 1 January 2012, provides for the application of a 90-day limit in place of the prior 180-day limit for the reporting of "non-performing" past due and/ or overdue exposures on loans to businesses and retail loans.

In accordance with the roll-out plan, in 2013 the Montepaschi Group carried out an estimation of Rating models for the Non-Banking Financial Institution (NBFI) segment. Furthermore, the Corporate and Retail models were calibrated by including data from the last few years (most representative of the current economic recession) in the time series.

2014 actions implemented on the Internal Rating System

In 2014, the MPS Group continued to update and revise its internal rating system in order to implement the several events which marked 2014 and which, either directly or indirectly, impacted the loan portfolio's risk parameters:

- Firstly, regulatory provisions profoundly changed the framework of prudential supervision in order to strengthen capital requirements and incorporate the new Basel III standards;
- The economic cycle continued to be very severe, with further significant impacts on the level of risk at both system-wide level and on the MPS portfolio. The

impact affected risk in the performing portfolio which continued to show very high default rates and a decline in its ability to recover non-performing positions;

- The regulatory exercise known as the «Comprehensive Assessment» and, in particular, the Asset Quality Review (AQR) revealed a significant impact for the Montepaschi Group;
- Finally, there was a reduction in the closure of non-performing positions, which contributed to increasing the vintage of loans.

The combination of these events led to the need for maintenance actions to be implemented on risk parameters to incorporate a fuller and more up-to-date set of information, as per regulatory requirements.

In the light of these events, the MPS Group decided to adjust all its rating models and re-estimate the LGD model in line with internal protocol and Group practice which, over the last few years, have always provided for the annual re-estimation/calibration of all models as a result of the persisting economic cycle.

In addition to updating the time series, the calibration of PD in 2014 also involved the implementation of specific actions which, as previously mentioned, had an impact on the inflows of non-performing.

- **Inclusion of prospective default rate 2014:** To determine the anchor point, a number of analyses were performed to verify the consistency between the new anchor point and highlights from the economic situation in the months of 2014 not included in the calibration time series. To this end, an analysis was performed on 2014 data (calculated using the default flows observed between January 2014 – September 2014, a period not included in the calibration) and the calibration anchor points were restated. Where the 2014 data led to a deterioration in anchor points, these were included in the calculation of the final anchor point, for prudential purposes.

  AQR impact: as part of the AQR exercise, the Credit File Review included a classification review and a review of provisioning levels on all portfolios subject to the AQR. In 2014, the relevant MPS Group functions completed and fully incorporated the results of the Credit Credit File Review through the reclassification of loans and increased provisioning. In order to implement all the most recent findings, reclassifications from performing to default status have been included in the recalibration of models. This was carried out by quantifying the overall impact of this action in absolute terms, ie. as an add-on on the total default used to calculate the anchor points by segment. At the same time, the MPS Group committed to improving its default detection methods, largely relating to forborne exposures which significantly affected the AQR results. In the course of 2015, as soon as information on this activity is available, the calibration of models will be updated. As for LGD, in order to incorporate the most recent findings, a stock of significant positions not yet closed – but for which the recovery process can essentially be considered as closed - was included in the estimation sample (so-called incomplete work-outs). To this end, the percentage of adjustments of operational positions was identified, assuming that the recovery process was essentially concluded for over a certain percentage of coverage. In this connection, a level of coverage in excess of or equal to 99% was identified as significant. In line with expectations, the actions implemented on the risk parameters led to an increased PD and LGD, providing credit risk estimates which included the initial findings that emerged during the AQR exercise and which are more aligned with the risk exposure observed during the recent recessive economic climate.

Use of Internal Models

Prior to authorisation from the bank of Italy enabling the Montepaschi Group to calculate capital absorptions according to the rules set out for the advanced internal rating systems, the Group used the parameters underlying the calculation of risk Weighted assets also for other operational and internal management purposes. The basic principle called for the use of Basel 2 input factors –as much in line with operating requirements as possible- even though, for obvious reasons, operational practices naturally diverge from supervisory standards, with some methodological fine-tunings and adjustments required for internal purposes and calculation systems. in particular, "across-the board" parameters used for both "supervisory reporting" and "operational" practices are in relation to the Probabilities of default (PD) resulting from internal rating systems and the loss rates on the "impaired" portfolio (LGD). The latter provide the basis of calculation for different systems of measurement and monitoring, and specifically for:

- **Measurement of economic capital for credit risk.** Among the inputs used for the credit model and related VaR output to be operational, the same PD and LGD variables are applied as those that are also used for regulatory purposes. it is clear that certain adjustments have been necessary, such as the use of probabilities of default "not subject" to validation for portfolios other than "corporate" and "retail", resulting from internal rating systems not yet subject to validation or from main rating agencies, appropriately re-mapped to the internal master scale. With regard to LGD, the Group uses parameters estimated on the basis of portfolios subject to validation according to provisions set out by supervisory authorities, although excluding the economic downturn effect that is contemplated only for regulatory purposes; out-of-validation portfolios use parameters estimated on the basis of medium-long term recovery rates, if any, or LGD rates in line with those set out by internal provisions under the FIRB approach. Although EAD for supervisory purposes follows the standardised approach as it is pending validation, it is calculated as the sum of drawn amounts plus undrawn balance (committed amount – drawn amount) multiplied by a Credit Conversion Factor (CCF) if this margin is higher than 5% of the committed amount, whilst for margins below this threshold, the EAD is determined as the drawn amount multiplied by a factor (K). Both types of ratios distinguish between Legal Entity, Segment, Type of Exposure, size class and rating class. For Financial and Commercial Signature loans, the EAD is multiplied by a factor (RC), which expresses the probability that the committed amount does not become a balance sheet exposure upon default of the counterparty.

- For **the calculation of risk-adjusted performance and measurement of value creation**, the Group follows the same calculation logic as used in the loan portfolio model both for legal entities subject to validation and for those that are excluded from the scope. Furthermore, whenever new estimates or re-adjustments are made to the internal rating systems subject to validation, adjustment results are incorporated in the Vbm procedures which ensure continuous output alignment with the latest updates.

- The parameters which feed the calculation model for the **risk-adjusted pricing process** are the same as those used for the loan portfolio model, even though with some extensions implicit in the pricing model. The pricing model which price-marks different types of loans with different maturities, requires input not only from the annual Probability of default but also from marginal, forward and multi-period Pds. For these reasons, the Montepaschi Group has developed specific calculation methodologies for these default probabilities, all in compliance with the annual Pd resulting from the validated rating systems. Similarly, lGd calculation is based on the same criteria as those used and mentioned above for the loan Portfolio model, though not taking account of economic downturns.

- In relation to **credit process monitoring**, the following should be noted:
  - processes of loan disbursement to

customers included in the airb scope of application have been completely 'reengineered' with the Electronic credit Facility record software. The Montepaschi Group's counterparty rating is the result of a process which evaluates - in a transparent, structured and consistent manner -all the economic financial, 'behavioural' and qualitative information relative to customers with whom the bank maintains credit risk exposures, based on model definitions, the use of information sources and methodological / operational solutions diversified by homogenous groups of counterparties. The Official rating thus determined has ordinary validity up to the twelfth following month and shall be reviewed by the end of that month. However, the rating review in the monitoring process may be prompted at an earlier date during the validity period if ongoing, major monthly statistical Pd variations – exceeding specific cut-offs -are intercepted. The loan disbursement system is organised into several 'paths', depending on the type of customer and transaction requested, which envisage the possibility of executing the process of assigning a rating to each counterparty and do not allow for any decision-making powers to be exercised in the absence of a valid rating;

- The current algorithm for automatic detection of positions under Systematic Surveillance is based on the use of two metrics: an "Official" rating, and the synthetic anomaly index (it. ISA) in relation to the customer's credit behaviour, calculated in the presence of at least one reported critical event, which increases in grade based on the risk level,
- the Simplified renewal process for the electronic credit facility record is based upon the monitoring of ratings over time and a timely revision of the credit facility record when the level of impairment is such that there is an increased perception of risk resulting from either the credit facility being intercepted by credit monitoring. This process is applied to all counterparties with credit facilities subject to revision, which have matured or will mature in the month of reference;
- the principle underlying decision-making powers provides for levels to be assigned on the basis of individual counterparty ratings, exposure amounts, counterparty risk 'intensity' depending on the characteristics of the transactions (type and guarantees) and type of borrower;
- on the basis of these levels, the system for assigning powers identifies a nominal amount for each risk aggregate: power of approval is assigned to the decision-making

bodies, making reference to the combination of rating class and type of loan granted according to the principle of delegating the decision-making powers for the worst ratings to the uppermost levels. Exception to this rule is made for the board of directors, which has the highest level of decision-making powers, and for the levels of approval assigned to corporate decision-making bodies.

The policies for recognition of credit risk mitigation guarantees are implemented through a dedicated IT process which is applied for reporting purposes and does not overlap with the rules for managing guarantees and collaterals applicable to the loan disbursement process.

The IT application manages all rules for the admissibility of guarantees. The process is based on a first step registry of all guarantees, which outlines the Group operational framework. at a later stage, the data of each individual guarantee is assessed through an analysis of its specific characteristics. In particular, the following general requirements are verified:

- legal certainty;
- enforceability of Guarantee against third parties;
- timely liquidation;
- compliance with organisational requirements.

The importance of the internal ratings for operating purposes made it necessary to set up a rating system control and validation unit within the Montepaschi Group, which is organisationally independent from - and acts as a point of reference and guidance for- the unit established for the systems' development, maintenance and review. This unit meets the "credit risk control unit" requirements of statutory regulations for validation controls to be fulfilled.

Control Management model on Internal Rating System

An advanced internal rating system, according to current regulations in force (see Bank of Italy Circ. 263 BI 15th update – Title V, Chapter 7 and EU Regulation 575/2013, hereinafter CRR) should provide for appropriate forms of review and inspection at all levels of control activities.

The AIRB system used by the Montepaschi Group provides for the execution of automatic controls, i.e. controls regulated by specific operational protocols (e.g. hierarchical controls), within the operating units involved in the process of rating assignment. These controls are aimed at making sure that activities preliminary to rating assignment are properly performed (i.e. selection of a model suitable for customer or transaction assessment, identification of economic or legal relations between customers, compliance with internal procedures oriented to obtaining the information necessary for the assignment and updating of the rating).

The Validation, Monitoring and Risk

Reporting Area (Function Internal Validation) within the Risk Division, shall be responsible for the following levels of review contemplated by the regulations. The Service unit Validation and Monitoring steadily evaluates whether the estimates of all important risk components are accurate related to internal models. and produces the annual internal rating System (hereinafter IRS) Validation report of the Montepaschi Group expressing an opinion on the regular operations, prediction power and overall performance of the IRB system adopted. The opinion expressed by the Internal Validation Function is then examined by the Basel Operating Committee in order to share the guidelines for any remedial actions required. The Internal Audit Area's internal audit function also has the task of assessing the efficiency of the overall structure of controls for the rating system (responsible for review controls).

The methods adopted by the above operating units in relation to the operational procedures of validation and review are briefly illustrated below.

Internal Rating System Validation Process

The responsibility for IRS validation has been allocated to the Head of the Internal Validation Function, which is supported by the Validation and Monitoring Service in carrying out operational activities that are required for validation. Key findings which emerge from the validation controls carried out during the year by the Staff unit are submitted to the Basel Operating Committee and, in the case of significant findings, to the Parent Company's Risk Committee.

The Validation and Monitoring Service was set up in February 2014 with the specific task of validating certain risk measurement models – regulatory and non-regulatory – by constantly verifying the reliability of results obtained and maintaining alignment with regulatory requirements. The Validation and Monitoring Service has adopted the skills and competences of the former Advanced Systems Validation Support staff for the validation of credit risk measurement models.

The results of these controls are pointed out and reported periodically to the Top management, the units involved and the ICA . Once a year these results are included in the "annual internal rating System Validation report" which expresses an overall opinion on the position of the IRS with respect to the supervisory requirements. The validation process, within which the abovementioned controls are carried out with a view to finally validating the rating System, consists of the following formal validations::

- validation of processes: checks compliance of the internal rating assignment process with the minimum organisational requirements of circular no. 263 of the Bank of Italy, with a specific focus on the following aspects:
  - design of allocation processes and,

where possible, the backtesting of process results while checks on the efficiency of the processes themselves are performed by the Internal Audit Function;

- analysis of consistency between the changes in ratings made by an operator and the guidelines issued by the units responsible for the assignment of ratings;
- verifying the actual use of the rating system within the company, identifying the players and processes involved with a particular focus on the loan disbursement and renewal process;

- validation of models: checks that the statistical models for the production of the risk parameters used by the Group MPS maintain specific performance levels and comply with the minimum organisational and quantitative requirements provided for by the rules; and in particular the following is verified:
  - performance: assessment of the prediction power of the model and therefore its power to separate highly solvent customers from potentially hazardous customers;
  - calibration: check whether the risk preliminarily assigned to each class of rating matches the observed historical risk;
  - stability: assessment of the stability of the assigned ratings over time;
  - stress testing: review of stress testing activities carried out on the models by the model development unit;
  - benchmarking: check consistency of ratings assigned internally with those assigned by outside structures on portfolios having a low number of counterparties;

- validation of data: reviews compliance with the minimum requirements set out by the regulations in relation to the quality of data used by the IRS.

The process of validation involves the preparation of questionnaires for each scope of action identified, with the objective of checking compliance of each aspect of the IRS with regulatory requirements. The detailed positions on each requirement are collated in an overarching opinion of validation through a system of scoring of the replies and weighting of the questions. The methods chosen meet the requirement of making the process of validation transparent and objective, not only with respect to the Supervisory authorities but especially to each operating unit which develops the IRS and is informed of any faults in the system, for correction. This ensures easier action on the gaps and consequently a better control of the proper operations of the IRS by SVM.

Process of Internal Review of the Internal Rating System

In line with the existing regulations, the internal audit area of the Montepaschi Group adopts the professional Standards and guidelines of the main domestic and international entities, through an independent and objective activity of assurance and advice aimed at controlling, also through on site inspections, the regular operations and risk trend and assessing the functional efficiency and compliance of the Internal Control Systems in order to improve the effectiveness and efficiency of the organisation. The introduction of advanced systems of risk measurement and management (in particular, with reference to credit risk, see circular no. 263 of 27 December 2006 "New regulations for the prudential supervision of banks) determined an extension of activities mandated to the internal audit unit and related responsibilities. The overall review approach focuses on the objective of providing a coherent assessment of adequacy, in terms of both effectiveness and efficiency, of the control systems of the rating-based process of governance and management of credit risk. In particular, the responsibilities assigned to the internal audit unit by the above-mentioned circular, with reference to the review of the advanced models for credit risk assessment and management can be summarised in three following points:

1) assessment of the overall functional efficiency of the control system of the AIRB approach;

2) assessment of the functional efficiency and regularity of the internal validation process;

3) review of system compliance with the requirements for regulatory use of risk estimates.

However, the main operating components attributable to the adoption of an internal rating system require that the review of that process be considered as part of a larger analysis and assessment of the whole loan management process. The objective is to ensure the materialisation of important synergies from the point of view of the actual cost of implementation and, above all, the overall and coherent observation of the events analysed which share different audit findings on the rating process stemming from the reviews carried out in the distribution network and Group companies. The audit controls to be carried out for an assessment of the above-mentioned aspects are guided by efficiency and compliance checks. As a result of the different kinds of control, the internal audit unit performs its responsibilities which consist in reviewing the validity of the whole IRS and the validation process, as well as compliance of the system with regulatory requirements.

The following table reports the Group's exposure to credit risk – AIRB , as at 31 December 2014

divided by classes of regulatory activities. The exposure values reported are determined according to prudential supervisory requirements and as such are inclusive of value adjustments and do not factor in the effects of risk mitigation techniques which, in the case of exposures subject to an internal models-based approach, are directly included in the risk-weighting factor applied. As for guarantees issued and commitments to disburse funds, the values reported take into account credit conversion factors. Following are their values of the risk weighted assets (RWA), expected loss (PA) and actual losses (PE) as at the end of 2014.

Tab. 5.3.1 – IRB Approach: Summary of Exposures, RWAs, expected and actual losses

	dec-14		dec-14	
Regulatory Portfolio	Exposure	RWA	PA	PE
Exposures to or secured by corporates	50,358,660	18,348,417	10,755,570	11,263,182
- Exposures to or secured by corporates - SMEs	32,276,311	9,396,770	7,866,740	8,356,708
- Exposures to or secured by corporates - Other companies	18,082,349	8,951,647	2,888,830	2,906,474
Retail Exposures	67,373,524	10,792,082	8,688,542	9,162,833
- Retail Exposures Secured by real estate - SMEs	10,486,140	3,014,598	871,141	823,962
- Retail Exposures Secured by real estate - Individuals	30,106,751	2,671,257	321,425	349,734
- Qualifying revolving Retail Exposures	8,868	968	96	90
- Other retail Exposures - SMEs	21,969,599	4,722,059	6,077,613	6,371,460
- Other retail Exposures - Individuals	4,802,167	383,200	1,418,267	1,617,587
IRB Approach Total	**117,732,184**	**29,140,499**	**19,444,112**	**20,426,015**

The table below shows the breakdown by PD class, identified by the MPS Group to allow for a significant distinction to be made for credit risk (see para. 5.3) by Group exposures and regulatory portfolio.

Tab. 5.3.2 – IRB approach: Distribution by regulatory portfolio and PD classes

Classes of creditworthiness	Exposures vs. Corporates	Retail Exposures	AIRB Total Exposures	AIRB Total EL	AIRB Total AL
Class 01	1,264,129	13,410,251	14,674,380	2,741	3,918
Class 02	5,942,917	12,945,117	18,888,034	14,601	22,798
Class 03	9,739,372	11,042,722	20,782,094	64,390	87,140
Class 04	8,221,750	9,751,554	17,973,303	242,455	239,819
Class 05	1,543,876	2,156,526	3,700,403	223,825	202,816
Class 06	23,646,616	18,067,355	41,713,971	18,896,101	19,869,525
Total	**50,358,660**	**67,373,524**	**117,732,184**	**19,444,112**	**20,426,015**

The following table shows a breakdown by PD band with quantitative details for the advanced IRB approach of the Portfolio "Exposures to or guaranteed by businesses" divided by regulatory asset class:

SMEs,

Other companies.

Tab. 5.3.3 – IRB approach: Exposures to or secured by corporates - SMEs

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	670,675	422,873	249,562	64.79%	0.10%	32.09%	19.11%
Class 02	2,877,881	2,065,501	921,949	73.35%	0.34%	31.71%	35.90%
Class 03	5,711,955	4,817,176	979,817	85.54%	1.16%	28.83%	55.06%
Class 04	6,502,148	5,813,001	808,449	90.45%	4.75%	27.69%	77.03%
Class 05	1,393,945	1,202,319	218,089	87.21%	23.13%	25.82%	120.10%
Class 06	18,650,284	17,955,440	873,005	96.45%	100.00%	41.05%	-
Total	**35,806,888**	**32,276,311**	**4,050,870**		**4.31%**	**28.62%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds

(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Tab. 5.3.4 – IRB approach: Exposures to or secured by corporates - Other companies

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	4,226,153	841,256	3,795,506	19.91%	0.08%	38.40%	20.30%
Class 02	9,655,092	3,877,416	6,673,627	40.29%	0.35%	37.08%	45.14%
Class 03	8,713,736	4,922,196	4,697,629	56.75%	1.06%	37.70%	74.14%
Class 04	3,348,358	2,408,749	1,243,532	72.29%	4.53%	35.55%	112.68%
Class 05	414,921	341,557	100,509	82.41%	22.36%	36.34%	195.43%
Class 06	6,334,611	5,691,176	846,614	90.08%	100.00%	48.84%	-
Total	**32,692,872**	**18,082,349**	**17,357,417**		**2.03%**	**37.10%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds

(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

The following table shows a breakdown by PD band with quantitative details for the advanced IRB approach of the Portfolio "Retail Exposures" divided by regulatory asset class:

Secured by real estate - SMEs,
Secured by real estate - Individuals,
Qualifying revolving,
Other retail exposures - SMEs,
Other retail exposures - Individuals.

Tab. 5.3.5 – IRB approach: Retail Exposures Secured by real estate - SMEs

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	83,718	82,817	2,685	98.92%	0.09%	18.39%	3.59%
Class 02	683,649	666,540	38,886	97.50%	0.37%	18.27%	10.54%
Class 03	2,891,107	2,858,427	73,557	98.87%	1.18%	18.52%	24.02%
Class 04	3,118,675	3,030,532	183,340	97.17%	4.44%	18.80%	50.98%
Class 05	782,347	743,459	75,021	95.03%	24.56%	18.72%	95.47%
Class 06	3,177,898	3,104,366	134,244	97.69%	100.00%	22.83%	-
Total	**10,737,394**	**10,486,140**	**507,733**		**4.79%**	**18.64%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds
(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Tab. 5.3.6 – IRB approach: Retail Exposures Secured by real estate - Individuals

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	12,530,269	12,519,683	20,089	99.92%	0.13%	12.71%	3.91%
Class 02	10,139,435	10,130,570	26,790	99.91%	0.35%	12.11%	7.61%
Class 03	3,884,965	3,879,159	16,776	99.85%	0.91%	12.13%	14.95%
Class 04	1,223,670	1,220,235	8,830	99.72%	4.54%	12.20%	38.21%
Class 05	519,294	516,573	3,774	99.48%	24.39%	12.08%	70.55%
Class 06	1,856,308	1,840,530	17,521	99.15%	100.00%	14.68%	-
Total	**30,153,942**	**30,106,751**	**93,781**		**0.95%**	**12.38%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds
(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Tab. 5.3.7 – IRB approach: Qualifying revolving Retail Exposures

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	6.747	1.018	5.729	15.09%	0.13%	29.70%	2.36%
Class 02	2.842	2.039	803	71.75%	0.31%	26.00%	4.23%
Class 03	2.609	1.742	867	66.78%	1.07%	25.72%	10.77%
Class 04	4.017	3.705	312	92.23%	2.74%	17.57%	15.31%
Class 05	198	162	37	81.47%	23.47%	21.04%	63.53%
Class 06	300	202	99	67.16%	100.00%	30.84%	-
Total	**16.713**	**8.868**	**7.846**		**1.91%**	**22.68%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds
(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Tab. 5.3.8 – IRB approach: Other retail Exposures - SMEs

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	2,612,983	560,688	2,238,632	21.63%	0.09%	39.10%	7.37%
Class 02	4,813,300	1,679,830	3,378,970	35.40%	0.35%	38.67%	18.72%
Class 03	7,059,128	3,783,433	3,458,761	54.60%	1.17%	38.21%	35.43%
Class 04	7,374,536	5,090,057	2,443,584	70.30%	4.68%	38.17%	48.05%
Class 05	1,043,256	802,477	237,486	78.71%	22.55%	37.53%	72.26%
Class 06	10,871,925	10,053,113	827,796	92.87%	100.00%	59.10%	-
Total	**33,775,129**	**21,969,599**	**12,585,229**		**3.94%**	**38.26%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds
(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Tab. 5.3.9 – IRB approach: Other retail Exposures - Individuals

Rating Class	Nominal Value	Exposure Value	Unutilized Margins (a)	CCF% (average)	Weighted Average PD (b)	Weighted Average LGD(b)	Average Risk Weight % (RW%)
Class 01	782,932	246,046	540,619	31.44%	0.13%	18.23%	5.80%
Class 02	817,166	466,137	371,244	57.09%	0.33%	20.80%	12.28%
Class 03	859,539	519,960	365,062	60.54%	1.10%	20.79%	22.68%
Class 04	485,319	407,024	124,198	83.94%	5.00%	22.77%	35.75%
Class 05	98,440	93,855	4,913	95.39%	24.18%	20.71%	51.44%
Class 06	3,094,812	3,069,144	26,682	99.18%	100.00%	44.42%	-
Total	**6,138,208**	**4,802,167**	**1,432,718**		**2.92%**	**20.89%**	

(a) For reporting purposes, Unused Margin refer to issued guarantees and revocable and irrevocable commitments to disburse funds
(b) The weighted average PD (%) and weighted average LDG (%) under Total does not include class 6

Comparison between expected loss and actual loss

As part of the backtesting of the parameters of AIRB models, the MPS Group makes a comparison between the expected loss estimated at 31 December of the previous year and the actual loss observed at year end.

In order to clarify the results of the comparison it should be noted that although the two amounts are comparable, they are calculated on the basis of different logics.

Expected Loss (PA) is the average loss that the bank expects to face against a loan or loan portfolio classified as performing at the end of the previous year. It is calculated as the product between PD, LGD and EAD estimated in compliance with the prudential requirements; in particular, PD is estimated using a longer time series and thus better reflects risk in the portfolio on a through-the-cycle (TCC) basis.

Actual Loss is calculated as the total amount of provisions which were actually registered and recognised in the income statement on performing exposures as at 31 December of the previous year subsequently classified to default status one year later.

Taking into account what has been observed, i.e., that the expected loss expresses an estimation of loss essentially calculated on a TTC basis whereas the actual loss refers to what has been registered and recognised in a specified year, a comparison is provided between expected loss and actual loss ex-post in 2012, 2013, 2014 on corporate and retail exposures.

Tab. 5.3.10 – Comparison Expected Loss – Actual Loss

Reference Year	Portfolio	Expected Loss	Actual Loss	EL vs AL (var %)
2012	Exp. vs Corporates	542,000	738,000	36.1%
	Retail Exp.	332,000	272,000	-18.1%
	TOTAL	**874,000**	**1,009,000**	**15.5%**
2013	Exp. vs Corporates	507,000	784,000	54.7%
	Retail Exp.	276,000	232,000	-15.9%
	TOTAL	**783,000**	**1,016,000**	**29.8%**
2014	Exp. vs Corporates	425,000	1,371,000	222.8%
	of which implementing AQR	*140,000*	*933,000*	*567.2%*
	of which not implementing AQR	*285,000*	*438,000*	*53.7%*
	Retail Exp.	251,000	489,000	94.6%
	of which implementing AQR	*35,000*	*276,000*	*687.9%*
	of which not implementing AQR	*216,000*	*213,000*	*-1.4%*
	TOTAL	**676,000**	**1,860,000**	**175.2%**
	of which implementing AQR	*175,000*	*1,209,000*	*591.4%*
	of which not implementing AQR	*501,000*	*651,000*	*29.9%*

Expected loss and actual loss values refer respectively to the expected loss registered at the start of the year and the actual loss registered at year-end on a sample of exposures analysed. The sample relates to the exposures of positions which at the start of the year were classified as performing and which transitioned to default status in the course of the year.

The comparison shows that the difference between actual loss and expected loss for 2012 and 2013 is due to the different logics applied in calculating the two amounts; the largest difference between actual loss and expected loss registered in 2013 for the corporate segment (exposures vs. corporates) largely relates to the higher default rates and the significantly lower levels of recovery for non-performing loans vs. the PD rate estimated at the beginning of the period, resulting from a strongly recessive and worse-than-expected economic cycle when compared to the expectations included in the models. Expected loss calculated with TTC AIRB models does not fully reflect the challenging economic conditions registered in 2013. An even greater difference between actual and expected loss is shown for 2014 since, in addition to the items already reported in 2013, there were additional non-recurring provisions relating to the AQR remedial actions at the end of 2014, designed to incorporate the results of the Asset Quality Review.

Indeed, in 2014 the MPS Group implemented these extraordinary actions on provisioning levels in the portfolios which had been subject to review and included, in its 2014 financial statements, the ECB requirements communicated to the MPS Group (October

2014) upon completion of the AQR exercise. The logics for reviewing assets on the basis of ECB supervisory guidelines resulted in a tougher assessment of the level of credit risk and a consequent increase in coverage levels on exposures. In the course of 2014, the Montepaschi Group introduced a number of corrective measures to the AIRB models in order to better capture the effects of the ongoing recession. Further measures to be implemented in 2015 are currently being studied.

Comparison between estimated and actual results of backtesting

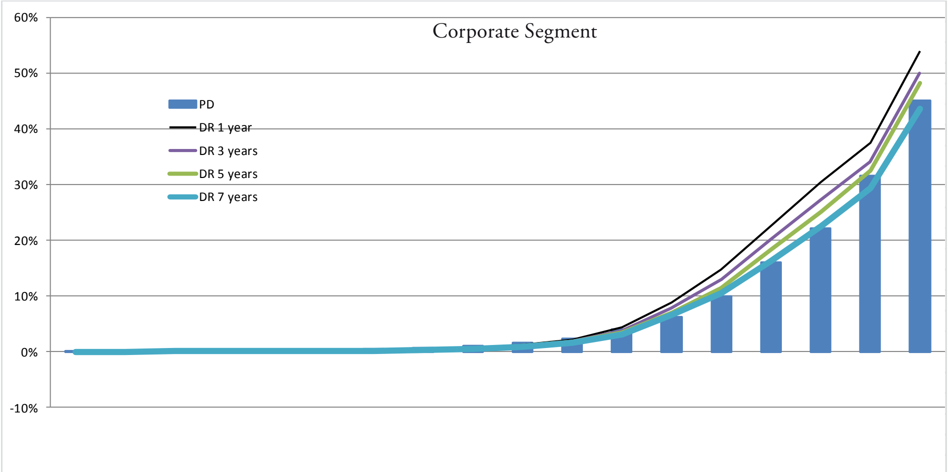
As previously pointed out, the Monte dei Paschi Group adopts advanced models to determine capital requirements for 'corporate' and 'retail' portfolios. Internally estimated PD (Probability of Default) and LGD (Loss Given Default) parameters are therefore used for both portfolios.

A comparison of estimated vs. actual losses is made on a yearly basis within the framework of PD and LGD backtesting by internal first and second level control functions.

As for PD, statistical models are monitored using a structured automated algorithm. Monitoring consists in a determined number of tests aimed at assessing whether the characteristics of the models in the implementation/production environment continue to be similar to those found in the development phase, in terms of representativeness and performance. Within the monitoring process, estimated PDs are compared against observed default rates through a set of tests designed to verify the alignment between the Probability of Default and Default Rates both for the latest period of reference and for the time series equal to the one used for estimation, in line with the development methodological approach based on long-term average values. The impact on any underestimated default rates on the variables used to measure credit risk (Expected Loss and Regulatory Capital) is also quantified. The overall outcome is formulated on the basis of an internal protocol, which also includes the actions to be put in place in the event of a negative outcome.

Comparison between PD and Default Rates observed by rating class for the Corporate segment

The following tables show the comparison between regulatory PD and default rates observed by rating class for the Corporate segment on different time series.



CLASS	AA1	AA2	AA3	A1	A2	A3	B1	B2	B3	C1	C2	C3	D1	D2	D3	E1	E2	E3
DR 1 year	0,00%	0,00%	0,00%	0,08%	0,04%	0,15%	0,21%	0,46%	0,64%	1,17%	2,24%	4,45%	8,73%	14,79%	22,55%	30,35%	37,48%	53,99%
DR 3 years	0,00%	0,00%	0,04%	0,06%	0,07%	0,13%	0,20%	0,38%	0,58%	0,98%	1,87%	3,80%	7,87%	12,92%	20,22%	27,24%	33,98%	49,87%
DR 5 years	0,00%	0,00%	0,09%	0,08%	0,09%	0,14%	0,21%	0,36%	0,57%	0,96%	1,72%	3,40%	6,98%	11,46%	18,30%	25,10%	32,41%	48,23%
DR 7 years	0,00%	0,02%	0,07%	0,07%	0,08%	0,12%	0,18%	0,31%	0,51%	0,89%	1,54%	3,11%	6,53%	10,47%	16,27%	22,41%	29,31%	43,51%
PD	0,03%	0,05%	0,09%	0,13%	0,20%	0,30%	0,46%	0,69%	1,05%	1,59%	2,42%	3,99%	6,31%	9,95%	16,03%	22,12%	31,63%	45,00%

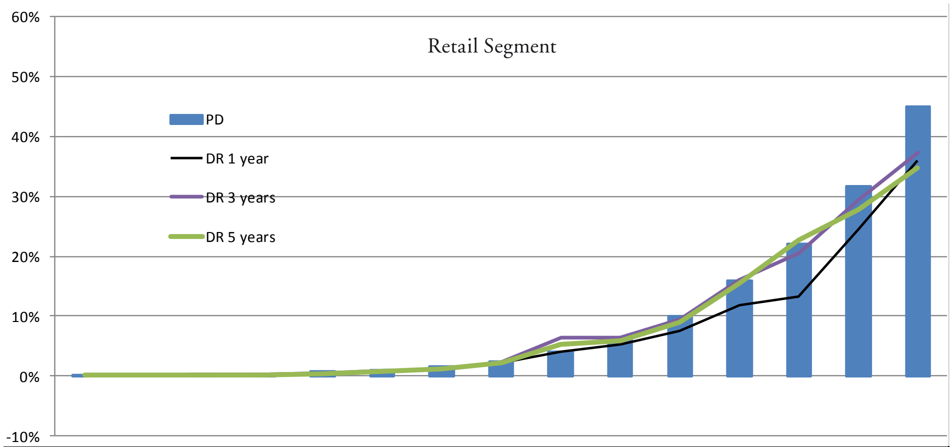
The comparison shows how the alignment between regulated PD calculated on a TTC basis and average default rates on different time series' is gradually reduced as the time series used in calculating the average default rates decreases. This shows that regulatory PDs calculated on a TTC basis are immediately comparable with default rates calculated on long-term time horizons, whereas comparability tends to decrease as the time horizon applied decreases.

In particular, the ongoing economic crisis, which confirmed a high Default Rate for 2014, particularly harsh for the Corporate segment, cannot be fully captured by the regulatory PD estimated on an essentially TTC basis. For this reason, the results of the annual calibration tests were not satisfactory for the Corporate models, particularly for the Construction sector (Multiannual), which registered the greatest misalignment between estimated PD and default rates observed. Multiannual tests (on a TTC basis), instead, confirmed a satisfactory level of alignment between PD and Default Rate.

The performances of Corporate models in terms of discriminative power were, on the other hand, fully positive and confirmed the good grading ability of the models, with levels of accuracy that were very much in line with the ranges recognised in AIRB PD model best practices.

Comparison between PD and Default Rates observed by Rating Class for the Retail segment

The information shown for the Retail segment is similar to that reported for the Corporate models.



CLASS	A1	A2	A3	B1	B2	B3	C1	C2	C3	D1	D2	D3	E1	E2	E3
DR 1 year	0,05%	0,15%	0,23%	0,22%	0,44%	0,76%	1,10%	2,16%	4,07%	5,35%	7,46%	11,89%	13,29%	24,52%	36,02%
DR 3 years	0,06%	0,16%	0,24%	0,23%	0,44%	0,84%	1,17%	2,25%	6,46%	6,43%	9,53%	16,04%	20,62%	29,27%	37,29%
DR 5 years	0,1%	0,2%	0,2%	0,2%	0,5%	0,8%	1,1%	2,2%	5,2%	6,0%	8,9%	15,6%	22,7%	27,9%	34,8%
PD	0,13%	0,20%	0,30%	0,46%	0,69%	1,05%	1,59%	2,42%	3,99%	6,31%	9,95%	16,03%	22,12%	31,63%	45,00%

The default rates observed for the retail segment are broadly in line with regulatory PD and show an essentially flat rend which increases as rating class risk exposures increase. The retail segment was not affected by default rates showing strong discontinuity, both along the time horizon used to calibrate the models and in relation to the past year. For this reason, the outcome of the calibration tests, both annual and multiannual, did not show any particular problems and confirmed PD levels that were prudentially higher than the Default Rates.

The performances of retail models in terms of discriminative power were fully positive and confirmed the good grading ability of the models, with levels of accuracy that were very much in line with the ranges recognised in AIRB PD model best practices.

As regards LGD, the parameters were subject to a complete re-estimation in the course of 2014 in order to align LGD rates with the levels of loss observed over recent years. In particular, the widening trend on work-out recoveries led to a significant increase in the LGD of non-performing loans and the inclusion of the more recent defaults in the estimated cure rate resulted in a higher LGD for other default statuses as well as for performing loans.

5.4 Credit Risk: value adjustments

For classification of impaired loans into the various categories of risk (non-performing, watchlist, restructured and past due exposures), the Montepaschi Group refers to the regulations issued by the bank of Italy, as supplemented with internal provisions which set out automatic criteria and rules for the transfer of receivables from and to different risk categories. in line with supervisory definitions, impaired loans are intended to include the following:

- loans past due;
- restructured loans or loans being restructured;
- watchlist loans;
- non-performing loans.

With regard to the restructuring of loans, three different categories have been identified:

- loan restructurings (as defined in circular 272 of the bank of Italy);
- loan renegotiations;
- debt settlement via borrower substitution or debt-for-equity swap.

In line with Bank of Italy's regulations, debt (loan) restructuring is understood as a transaction whereby the bank, for economic reasons, makes a concession to the borrower in light of his financial difficulties, which it would not have made under other circumstances and which causes a loss to the lender. The bank's concession consists in its waiver of certain contractually defined rights, which translates into an immediate or deferred advantage for the borrower, who benefits from the waiver, and a corresponding loss for the lending bank. The effects of the waiver are measured by the negative (positive) change in the economic value of credit (debt) as compared to the book value of credit (debt) prior to restructuring. The renegotiation of loans granted by the bank to performing customers is substantially equated with the opening of a new position, if it is granted essentially for commercial reasons rather than for the borrower's economic-financial difficulties and provided that the interest rate applied is a market rate as at the date of renegotiation.

As an alternative to the previously described options (restructurings and re-negotiations), the bank and the borrower may, agree on settlement of the original debt via:

- novation or assumption of the loan by another borrower (release from debt liability);
- substantial modification of loan terms involving a debt-equity swap. Said events, involving a substantial modification of contractual terms, provide for cancellation of the pre-existing loan agreement from an accounting standpoint, and consequent booking of the new agreement at fair value, recognising through profit or loss a profit or loss corresponding to the difference between the book value of the old loan and the fair value of assets received.

Loans are autonomously classified by the relevant units, except for loans more than 90 days past due and watchlist loans more than 270 days past due, which are measured using automated procedures.

With regard to other defaulted loan categories, the Montepaschi Group has drawn up an accurate process of classification and determination of value adjustments to be applied based on the expertise of relationship managers and support provided by dedicated units specialised in the management of impaired loans. When classifying loans as watchlist or nonperforming, the relationship manager defines, on the basis of evidence available, an estimated measurement of failed recovery, broken down into exposure related to the actual loan and exposure related to interest and other expenses. Subsequently,

the head office units specialized in the management of impaired loans periodically review these loan positions and the relative estimated failed recoveries, inserting changes, if any, in estimated losses.

These estimates are the calculation basis for the analytical valuation and subsequent determination of the balance sheet value adjustments.

Methodology for determining value adjustments

At each balance-sheet date, in linea con lo IAS 39, the financial assets not classified as held-for-trading or designated at fair value are evaluated to check whether there is objective evidence of impairment that might render the book value of these assets not entirely recoverable.

A financial asset has suffered a reduction in value and impairment losses must be posted to the financial statements if, and only if, there is objective evidence of a reduction in future cash flows compared with those originally estimated as a result of one or more specific events that have occurred after initial recognition; the loss should be determined reliably and in relation to recent events.

The reduction in value may also be caused not by a single separate event but by the combined effect of several events.

The objective evidence that a financial asset or group of financial assets has suffered a reduction in value includes measurable data that arise from the following events:

- significant financial difficulty of the issuer or debtor;
- breach of contract, for example non-fulfilment or failure to pay interest or principal;
- granting beneficiary a credit facility that the Group has taken into consideration primarily for economic or legal reasons related to the beneficiary's financial difficulties and that would not have been granted otherwise;
- a reasonable probability that the beneficiary will file for bankruptcy or other financial restructuring procedures;
- disappearance of an active market for that financial asset due to financial difficulties. Nevertheless, the disappearance of an active market due to the fact that the financial instruments of the company are

no longer publicly traded is not evidence of a reduction in value;

- measurable data which indicate the existence of a significant drop in the estimated future cash flows for a group of financial assets from the time of their initial recognition, even though the reduction cannot yet be matched to the individual financial assets of the Group, including:
  - unfavourable changes in the status of payments of the beneficiaries within the group; or
  - local or national economic conditions that are associated with non-fulfilment related to internal Group assets.

For the purpose of determining adjustments to the book-value of loans (customer loans, loans to banks, unsecured loans), an analytical and collective valuation is carried out considering the various levels of impairment as indicated below.

An **analytical assessment** is made of:

- non-performing loans;
- watchlist loans;
- restructured loans.

Conversely, the following are subject to collective assessment:

- past due loans and/or overdrafts;
- performing loans;
- exposures subject to country risk.

For loans subject to **analytical assessment**, (classified as non-performing, watchlist or restructured as defined by the bank of Italy), the amount of value adjustment for each loan is equal to the difference between the loan book value at the time of measurement (amortised cost) and the current value of estimated future cash flows, as calculated by applying the original effective interest rate. In the case of restructured loans, estimation of future cash flows takes account of the effects from changes in the contractual terms and conditions following restructuring.

Expected cash flows take into account expected recovery times, presumable salvage value of any guarantees as well as costs likely to be incurred for the recovery of credit exposure.

The value adjustments are booked to the profit and loss statement under item “130 - Net impairment losses (reversals)”.

The analytical assessment of the aforementioned non-performing loans requires defining repayment schedules for each position, in order to determine the cash flows deemed to be recoverable. in this respect, with the valuation process adopted by the company, thresholds have been identified in terms of amounts of receivables, under which plans for recovering the exposures are defined on an automated basis. Such thresholds are set in accordance with bands characterised by limited exposure in relation to the total and by a large number of positions.

Receivables with no individually identified objective evidence of impairment loss are subject to collective appraisal. This valuation occurs by credit-risk homogenous categories of receivables, indicative of the debtor’s ability to repay sums contractually owed. The segmentation drivers used for this purpose consist of: economic sector, geographic location and customer segments (turnover); on the basis of the latter indicator, the main segments of the portfolio are differentiated as follows:

- Retail;
- Small and Medium Enterprise Retail;
- Small and Medium Enterprise Corporate;
- Corporate;
- Large Corporate;
- Banks;
- Other.

The rate of loss is determined for each portfolio segment by assuming the Group's historical experience as a point of reference.

In particular, the impairment for the year of each loan belonging to a particular category is given by the difference between the book value and the recoverable amount on the date of valuation, with the latter being determined by using the parameters of the calculation method provided for by the new supervisory provisions, represented by Pd (probability of default) and LGD (loss given default).

If, in a subsequent year, the impairment loss decreases and the reduction can be objectively linked to an event that occurred after the impairment was recognised (such as an improvement in the financial solvency of the debtor), the previously recognised impairment loss will be reversed. The amount of the reversal is booked to the profit and loss statement under item 130 "Net impairment losses/reversals". With reference to loans which have been restructured by partial or full conversion into equity stakes of beneficiary companies, in accordance with joint document no. 4 issued by bank of Italy/Consob/ISVAP on 3 March 2010, it is noted that the fair value of quotas received was factored into the valuation. in particular, in the case of non-performing exposure, such classification was maintained for converted financial instruments received and, in the case of classification in the available-for-sale (AFS) category, capital losses recognised after conversion were posted directly to the profit and loss statement.

The table below shows a summary non-performing and performing exposures, adjustments and net values (Standard and AIRB approach). For further information on adjustments , please see part E in the Consolidated Notes to the Financial Statements as at 31 December 2014.

Tab. 5.4.1 – Credit Risk: value adjustments

Supervisory Perimeter	dec-2014 Not Performing Exposures	Performing Exposures	Adjustments	Net Values
AIRB	**41,713,971**	**76,018,213**	**20,426,015**	**97,306,169**
of which Off-Balance Sheet (guarantees and liabilities)	*-*	*5,262,320*	*184,717*	*5,077,603*
SMEs	17,955,440	14,320,871	8,356,708	23,919,603
Other companies	5,691,176	12,391,173	2,906,474	15,175,875
Secured by real estate - SMEs	3,104,366	7,381,774	823,962	9,662,178
Secured by real estate - Individuals	1,840,530	28,266,221	349,734	29,757,017
Qualifying revolving Retail Exposures	202	8,666	90	8,778
Other retail Exposures - SMEs	10,053,113	11,916,486	6,371,460	15,598,138
Other retail Exposures - Individuals	3,069,144	1,733,022	1,617,587	3,184,579
STD	**4,899,256**	**77,932,955**	**2,792,191**	**80,040,020**
of which Off-Balance Sheet (guarantees and liabilities)	*243,121*	*1,750,316*	*25,417*	*1,968,020*
Totale	**46,613,226**	**153,951,169**	**23,218,206**	**175,378,169**

5.5 Credit Risk: use of risk mitigation techniques

With reference to the retail and corporate loan portfolio, the Montepaschi Group does not apply any netting processes to the credit risk exposures with on- or off-balance sheet items with opposite sign. The Montepaschi Group adopts policies reducing the counterparty risk with institutional counterparties, by entering into netting agreements and collateral agreements both in relation to derivatives and repos *(repurchase agreements)*.

The Montepaschi Group has fulfilled the obligations set out by the New regulations for Prudential Supervision for the purpose of recognition of risk mitigation effects produced by any existing collaterals securing the loan.

The disbursement of loans secured by collaterals is subject to specific control measures, differentiated by type of guarantee pledged, which are applied during the phase of disbursement and monitoring. Two main types of guarantees, subject to different regulations, can be identified by volumes of loans granted and number of customers, namely Mortgages and Pledges (cash and Securities).

With reference to compliance with the main organisation requirements for the mitigation of risk, the Group ensured:

- the presence of an IT system in support of the life cycle phases of the guarantees (acquisition, valuation, management, revaluation and enforcement);
- regulated policies for the management of guarantees (principles, practices, processes), available to the users;
- the presence of regulated, documented procedures for the management of guarantees (principles, practices, processes), available to the users;
- independence of the customers' insolvency risk (internal rating) from any existing collaterals.

For the purpose of limiting residual risks (termination or non-existence of the value of protection), the Montepaschi Group requires that:

- in the case of a mortgage guarantee, the acquisition of the right be flanked by the underwriting of insurance policies (catastrophic events) in relation to the assets covered by the guarantee, and a report prepared by reliable experts;
- in the case of a pledge, the original value should be reinstated (ensuring the continuity of the guarantee through papers amending the original guarantee) in view of the depreciation of goods pledged. in the case of redemption of the pledge, the repayment should be made at the bank (collection).

The Montepaschi Group identified a set of technical forms (by purpose of the loan/type of customer) providing for the admissibility of mortgage guarantees. Within the IT system, the proposal of financing one of these types of loans triggers a request for detailed information on the characteristics of the real estate subject to guarantee (valuation) which, after loan approval, will make the acquisition steps compulsory.

In the specific case of mortgage loans to retail customers, the loan is disbursed according to specific disbursement processes, characterized by a standardised valuation/ inquiry process, which gather all information necessary for the proper management of real estate guarantees.

The Montepaschi Group has developed one single process for the acquisition of collaterals which is at the same time a working instrument and the expression of the Group's management policies. The instrument can activate different paths on the basis of the type of guarantee. The management of guarantees starts after loan disbursement approval, the process of which is broken down into different stages:

- acquisition (also multiple acquisition); the controls of (formal and amount) consistency with the guarantees proposed during the authorisation phase are performed in this stage;
- adjustment/change/amendment; useful to amend the characteristics of a guarantee without interrupting loan protection;
- query; gives information about the present data and the historical trend of guarantees received;
- repayment/cancellation.

A system to monitor the value of the collaterals on the basis of market values is in place. Monitoring of pledge transactions is carried out on a daily basis for listed securities deposited with the bank, while for mortgages, real estate value is currently verified once a year for non-residentials (where real estate is subject to point-in-time appraisals every three years for loans with exposures in excess of three million euro) and once every three years for residentials, using a market indices revaluation. In this respect, it is appropriate to underline that an assessment is made on the assets pledged as collateral during the mortgage loan approval phase. In the specific case of Retail mortgage loans, a dedicated disbursement process subordinates disbursement to the submission of a technical survey on the asset pledged, thus ensuring the fulfilment of obligations and compliance with relevant validity requirements upon acquisition of the guarantee. If the value of the property pledged as a guarantee is subject to market or foreign exchange risks, the Montepaschi Group uses the concept of guarantee differential, which is understood as a percentage of the value of the guarantee offered, determined as a function of asset value volatility. The only portion of the loan covered by the value of the assets net of the differential is considered as guaranteed during the approval phase. The monitoring phase requires the adjustment of the guarantees with a market value lower than the value approved, net of the differential. This is notified through a process of daily credit monitoring which alerts the Network with events which may modify risk perception. The availability of collaterals does not alter the valuation of the insolvency risk of a customer. However, it has an impact on the approval process since loan disbursements with mitigated risk are subject to different discretionary powers (this difference at Banca MPS is even more marked due to the introduction of authorization levels dedicated only to Land and Building credit).

The Montepaschi Group accepts different instruments to protect loans which can be summarised in the following categories:

- Pledge of sums deposited with the bank;
- Pledge of securities and mutual funds deposited with the bank;
- mortgages on immovables (real estate);
- mortgages on movables;
- Pledge of sums deposited with other banks;
- Pledge of securities deposited with other banks;
- Pledge on other entitlements (insurance policies not intermediated by Companies of the Group and Portfolios under management);
- Pledge on loans;
- Pledge on commodities;
- Other forms of collaterals (Insurance, Guarantee funds).

As at today, the first three categories (accounting for more than 98% of the nominal amount of the collaterals received) are compliant with regulatory/legal/organisational requirements set out by the New Supervisory Regulations for the enforcement of credit risk mitigation standards. All types that may be received by the Montepaschi Group are entered into a structured collateral management process, under which all sub-steps are operationally shared. If the measures of monitoring of the collaterals show operational irregularities during the acquisition phase or any inadequacies/losses of the values received as a pledge, events falling within the scope of credit monitoring policies are put in place, which trigger operational obligations of credit risk assessment.

The Montepaschi Group has fulfilled the obligations set out by the New Regulations for Prudential Supervision for the purpose of recognition of credit risk mitigation effects produced by any personal collaterals securing the loan. Personal credit protection consists of personal collaterals, personal collaterals issued by third parties and credit derivatives.

At Group level, personal collateral - as highlighted in the quantitative disclosure - covers a limited portion of the overall credit exposure. The main type of personal collateral consists of Guarantees (including omnibus guarantees and personal collateral issued by third parties) provided they are issued by the parties listed below:

- Sovereign governments and central banks;
- Public sector and local agencies;
- Multilateral development banks;
- Regulated intermediaries;
- Businesses that have a creditworthiness rating by an ECAI (External Credit Assessment Institution) of not less than 2 on the creditworthiness rating scale;
- Companies and individuals, if this type of customer has a probability of default determined using the same rules as for guaranteed exposures.

- Guarantee institutions (Confidi) provided they are:
  - registered in a special list provided for by art. 107 of the consolidated law on banking, as regulated financial intermediaries;
  - registered in a section of the list provided by art. 106 of the consolidated law on banking, having at least one of the following conditions:
    - an associated external rating of not less than 2;
    - issue a first demand guarantee backed by a counter-guarantee, on first demand, by Governments or Central Banks.

The activities that the MPS Group puts in place for compliance with the main organisational requirements are attributable to the similar activities envisaged for collateral other than real estate.

Under current regulations, banks which adopt the "advanced IRB" model may use the collateral as credit risk mitigation according to two different approaches:

- substitution of weighting or the probability of default (PD) of the debtor with the weighting or the PD of the protection provider
- substitution of personal LGD for unsecured LGD.

In both cases, mitigation is allowed on condition that the guarantor's PD is better than that of the main underlying obligor and that the requirement for personal guarantee admissibility is met, whereby capital absorption for the beneficiary of the guarantee should not be lower than capital absorption caused to the guarantor.

Based on Group internal regulations on CRM, the MPS Group has introduced two different policies for treatment of the exposures backed by personal guarantees, which fall within the AIRB scope: Policy 1 and Policy 2. Policy 1 applies to all exposures falling within the AIRB scope, to businesses and consumers, backed by personal collaterals issued by:

- Public Administration and Central Banks,
- Local Institutions,
- Public Sector Entities,
- Multilateral Development Banks,
- International Organisations,
- Regulated Intermediaries,
- Businesses that have a creditworthiness rating by an ECAI (External Credit Assessment Institution) of not less than 2 on the creditworthiness rating scale and that are not currently included in the internal models scope (e.g. Insurance Companies and UCITS).

Personal collateral issued by these groups/ individuals are treated by transferring the guaranteed exposure from the AIRB portfolio to the portfolio of the guarantor who then adopts standard treatment procedures.

Policy 2 applies to all those exposures falling within the AIRB scope, businesses and consumers, backed by personal collaterals issued by:

- Corporates,
- Consumers.

In this case, collateralised exposures see the application of an internally estimated loss rate for exposures secured by personal collateral (personal LGD), instead of the loss rate estimated for unsecured positions (LGD unsecured).

The Montepaschi Group accepts different instruments to protect loans which can be summarised in the following categories:

- Guarantees (including omnibus guarantees and personal guarantees issued by third parties);
- Endorsement;
- Guarantee policy;
- Credit mandate;
- Strong/binding patronage letters;
- Negotiable instruments;
- Performance bond agreement;
- Debt delegation;
- Expromission;
- Assumption of debt;
- Personal Collateral governed by foreign law;
- Credit derivatives:
  - credit default swap;
  - total return swaps;
  - credit linked notes.

Debt delegation, expromission and assumption of debt are considered valid for the purpose of credit risk mitigation if equivalent to the transfer of credit.

Fifth-of-salary backed loans can be considered as loans secured by personal collateral, if all requirements for this form of credit protection are met in the overall transaction structure.

The main concentration of collaterals is linked with Retail mortgage loans. However, it cannot be referred to as risk concentration by virtue of the principle of risk fragmentation which is implicit in this type of customers. Special provisions are in force on mortgage loans for Retail customers with amounts exceeding Euro 3 mln, a threshold beyond which the value of the collateral is kept up-to-date with regular appraisals of the property.

The value of real estate in relation to transactions below the threshold of relevance is updated through the measurement of the average values of the real estate market. Any information on the evaluations is provided, on an annual basis, by specialised industry operators (extraordinary updates may be generated by significant variations in the very short period).

Tab. 5.5.1 – Credit risk mitigation techniques (Standard approach)

Regulatory Portfolio (Standard Approach)	Financial Collaterals	Guarantees and Credit Derivatives	Other Guarantees
Exposures to Central governments or central banks	-	-	-
Exposures to Regional governments or local authorities	-	-	-
Exposures to Public sector entities	13,194	9,170	-
Exposures to Multi-lateral development banks	-	-	-
Exposures to International Organisations	-	-	-
Exposures to Institutions	40,911,645	68,897	-
Exposures to Corporates	1,056,087	76,833	-
Retail Exposures	32,865	808	-
Exposures secured by mortgages on immovable property	798	-	-
Exposures in default	5,177	2,347	-
Exposures associated with particularly high risk	-	-	-
Exposures in the form of covered bonds	-	-	-
Exposures to institutions and corporates with a short-term credit assessment	-	-	-
Exposures in the form of units or shares in collective investment undertakings ("CIUs")	6,663	-	-
Equity exposures	-	-	-
Other items	-	-	-
Items representing securitisazion positions	-	-	-
Standard Approach Total	**42,026,430**	**158,056**	**-**

Tab. 5.5.2 – Credit risk mitigation techniques (IRB approach)

Regulatory Portfolio (IRB Approach)	Financial Collaterals	Guarantees and Credit Derivatives	Other Guarantees
Exposures to or secured by corporates	-	389,835	-
- Exposures to or secured by corporates - SMEs	-	284,498	-
- Exposures to or secured by corporates - Other companies	-	105,337	-
Retail Exposures	-	425,855	-
- Retail Exposures Secured by real estate - SMEs	-	73	-
- Retail Exposures Secured by real estate - Individuals	-	-	-
- Qualifying revolving Retail Exposures	-	-	-
- Other retail Exposures - SMEs	-	423,599	-
- Other retail Exposures - Individuals	-	2,183	-
IRB Approach Total	**-**	**815,690**	**-**

6. Counterparty Risk

6.1 Counterparty Risk: general disclosure

The Montepaschi Group is committed to monitoring counterparty risk, understood as the risk that the counterparty in a transaction involving specific financial instruments (i.e. OTC derivatives, *securities financing transactions* and long settlement transactions) is in default before the settlement of the transaction.

In conformity with regulatory requirements, the Montepaschi Group uses the "market value" method to calculate the value of exposures for OTC derivatives and long settlement transactions. This method consists in calculating current and potential exposure using the market value as the current exposure and the regulatory add-on to represent, in a simplified manner, the potential future exposure.

For SFTs *(securities financing transactions)*, the comprehensive method with supervisory volatility adjustments is used.

The Group has adopted credit risk mitigation measures such as netting agreements, collaterals, break clauses, etc. to substantially limit the risk assumed.

From an operational point of view, activities relevant for the purpose of counterparty risk may be broken down into two macro segments on the basis of both counterparty characteristics (ordinary clients and institutional counterparties) and the operational and monitoring methods put in place by the Group.

With regard to business with financial institutions, counterparty risk exposure on individual credit lines is monitored on a daily basis by the control units of the various business units. In short, the process involves:

- granting credit lines to counterparties on the basis of requests from business unit staff, with a periodical review of the limits set;
- inserting the limits in the management systems;
- inserting the deals and collaterals according to ISDA/ISMA standards and related credit Support annexes (CSA) and Global Master Repurchase Agreements (GMRA) signed with each counterparty;
- daily activities to monitor and exchange collaterals with counterparties in relation to the market value of outstanding positions (Collateral Management);
- daily monitoring of drawn and overdrawn amounts - also in real time - considering, the guarantees pledged or received;
- the legal function periodically checking whether netting clauses and collaterals set out in the bilateral CSA and GMRA agreements signed with the counterparties are judicially and administratively valid in the event of their default, by making reference to the case law of their respective countries.

With regard to liquidity risk, assessments are carried out on any further additions to the guarantees required by institutional counterparties should the Montepaschi Group be downgraded as a result of signed CSA and GMRA agreements. The process for derivative transactions with ordinary clients is based on the distinction of roles and responsibilities among the different entities within the Group. Trading in derivatives with customers provides for centralization of product factors and market risk monitoring within MPS Capital Services, with allocation, management and monitoring of counterparty credit risk for customers in the bank's networks.

To this end, Retail Banks:

- authorise the credit facilities granted to customers;
- manage each transaction in their books;
- take care of the related documents and regulatory requirements;
- review the amounts drawn with respect to the credit facilities granted.

With regard to products offered to customers, from a general point of view, a series of common elements are typical of most operations. Specifically, the products traded are:

- not of a speculative nature;
- are for the exclusive purpose of covering risk;
- are associated with an underlying position, even if they are contractually and administratively separate from it;
- show limited elements of complexity;
- on the overall position covered, they hold no financial leverage.

To reduce counterparty risk since 2010, MPS Capital Services has indirectly joined the swap clear service managed by the central counterparty, LCH Clearnet London for activities with OTC derivatives. The centralisation of a part of trading in OTC derivatives to LCH makes it possible to considerably reduce the risk of default from these activities since LCH is the guarantor and direct manager of flows deriving from the contracts. Any default of a direct member of the service is covered by the guarantee funds and backup systems of LCH. A project is under way to identify and manage exposure that is adversely correlated with counterparties' credit quality (i.e. *wrong way risk*).

6.2 Counterparty Risk: exposure

Tab. 6.2.1 – Counterparty Risk: summary

Standard Approach	Exposure Total	RWA	Capital Requirements
SFT Operations	7,036,594	1,314,695	105,176
Derivative e op. with LT reg.	3,001,056	1,461,985	116,959
Total STD	**10,037,650**	**2,776,680**	**222,134**
AIRB Approach			
SFT Operations	206,246	1,467	117
Derivative e op. with LT reg.	696,594	481,236	38,499
Total AIRB	**902,840**	**482,703**	**38,616**
Total	**10,940,490**	**3,259,383**	**260,751**

The "Exposure" is a value calculated according to prudential supervisory requirements. In the Current Value method adopted by the Montepaschi Group, it is based on the positive fair value net of nettings; this value is increased by the future credit exposure (add-on) and reduced by the effects of the guarantee agreements. The future credit exposure takes account of the probability that in future the current value of the contract, if positive, may increase or, if negative, may become a credit position. This probability is linked with the volatility of the underlying market factors and the residual maturity of the contract. In other terms, it is calculated on the basis of the notional amount of all the derivatives taken into consideration, both with a positive and negative fair value. With regard to LSTs (Long Settlement Transactions) and SFTs (Securities Financing Transactions), the overall exposure recorded comes to approximately Euro 7,24 billion.
The exposure and the RWAs against Counterparty Risk in the trading book and banking book are reported in the table summarising EADs and RWAs by Credit Risk and Counterparty Risk (Tab 5.1.1) against credit risk under a standard and AIRB approach.

Tab. 6.2.2 – Counterparty Risk: derivatives

	Gross Positive Fair value (book values)	Effect of nettings agreements	Netted Fair value	Effect of collateral arrangements	Net Credit Exposure
Derivatives as at 31/12/2014	7,966,169	5,106,348	2,859,821	1,918,631	3,212,165
Derivatives as at 31/12/2013	9,047,809	6,350,618	2,697,191	1,706,804	3,729,597

The table represents the exposure of the Banking Group to counterparty risk for derivative instruments. All the financial and credit derivatives traded over the counter (OTC) with any counterparty institutional, corporate, retail counterparties etc.) are included in the table irrespective of the regulatory (trading and banking) portfolio they belong to. In particular, the "gross positive fair value" corresponds to the book value of the above-mentioned contracts and therefore is inclusive of the netting agreements. The Nettings" represent the gross positive fair value amount, which as a result of the agreements executed with the counterparties, is offset with negative value transactions. The net "netted fair value" indicates the positive fair value amount remaining after the nettings.

Tab. 6.2.3 – Derivatives: breakdown of positive fair value by type of unerlying

	Interest rates	Foreign currencies and gold	Equity securities	Credits	Other	Total
Derivatives as at 31/12/2014	6,555,918	183,081	672,319	526,230	28,621	7,966,169
Derivatives as at 31/12/2013	6,778,619	174,319	831,136	1,235,915	27,820	9,047,809

The table illustrates the breakdown of the positive gross fair value of OTC derivative contracts by type of underlying assets.

Tab. 6.2.4 – Credit Derivatives: notional amounts

Group of Products	Banking Portfolio		Regulatory Trading Book	
	Protection purchases	Protection sales	Protection purchases	Protection sales
Credit default swap	-	-	13,074,118	13,698,934
Total rate of return swap	-	-	-	114,385
Total a at 31/12/2014	**-**	**-**	**13,074,118**	**13,813,319**
Totale as at 31/12/2013	**55,500**	**200,000**	**22,033,054**	**22,784,624**

The table shows the notional values of credit derivative contracts, by portfolio (banking and trading book) and the role played by the Montepaschi Group (buyer/seller of protection).
For more details on derivatives, see Part E of the Consolidated Financial Statements 31.12.2014

7. Market Risk

7.1 Trading Book Market Risk: general disclosure

The Group's Regulatory Trading Portfolio (RTP), or Trading Book, is made up of all the Regulatory Trading Books managed by the Parent Bank (BMPS) and MPS Capital Services (MPSCS). The Trading Portfolios of the other subsidiaries are immune to market risk. Trading in derivatives, which are brokered on behalf of customers, calls for risk to be centralised at, and managed by, MPSC.

The market risks in the trading book of both the Parent Company and the other Group entities (which are relevant as independent market risk taking centres), are monitored in terms of Value-at-Risk (VaR) for operational purposes. The Group's Finance and Liquidity Committee is responsible for directing and coordinating the overall process of managing the Group's proprietary finance thereby ensuring that the management strategies of the various business units are consistent.

The Group's Trading Book is subject to daily monitoring and reporting by the Risk Management Area of the Parent Company on the basis of proprietary systems. VaR for management purposes is calculated separately from the operating units, using the internal risk measurement model implemented by the Risk Management function in keeping with international best practices. However, the Group uses the standardised methodology in the area of market risks solely for reporting purposes.

Operating limits to trading activities, which are established by the Board of Directors of the Parent Company, are expressed by level of delegated authority in terms of VaR, which is diversified by risk factors and portfolios, monthly and annual stop losses and Stress. Furthermore, the trading book's credit risk, in addition to being included in VaR computations and in the respective limits for the credit spread risk component, is also subject to specific operating limits for issuer and bond concentration risk which specify maximum notional amounts by type of guarantor and rating class.

VaR is calculated with a 99% confidence interval and a holding period of 1 business day. The Group adopts the method of historical simulation with daily full revaluation of all basic positions, out of 500 historical entries of risk factors (lookback period) with daily scrolling. The VaR calculated in this manner takes account of all diversification effects of risk factors, portfolios and types of instruments traded. It is not necessary to assume, a priori, any functional form in the distribution of asset returns, and the correlations of different financial instruments are implicitly captured by the VaR model on the basis of the combined time trend of risk factors.

From the point of view of methodological adjustment, in the last quarter of 2014 the commodity risk factor was introduced in the internal management model: this completes the representation of risk in the Group's financial portfolios.

The management reporting flow on market risks is periodically transmitted to the Risk Committee, the Group's Top Management and the Board of Directors of the Parent Company in a Risk Management Report, which keeps Executive Management and governing bodies up to date on the overall risk profile of the Group.

The macro-categories of risk factors covered by the Internal Market Risk Model are IR, EQ, CO, FX and CS as described below:

- IR: interest rates on all relevant curves, inflation curves and related volatilities;
- EQ: share prices, indexes, baskets and relative volatilities;;
- CO: commodity prices, indexes and baskets;
- FX: exchange rates and related volatilities;
- CS: credit spread levels.

VaR (or diversified or net VaR) is calculated and broken down daily for internal management purposes, even with respect to other dimensions of analysis:

- organisational/management analysis of portfolios,
- analysis by financial instrument,
- analysis by risk family.

It is then possible to assess VaR along each combination of these dimensions in order to facilitate highly detailed analyses of events characterising the portfolios.

In particular, with reference to risk factors the following are identified: Interest Rate VaR (IR VaR), Equity VaR (EQ VaR), Commodity VaR (CO VaR), Forex VaR (FX VaR) and Credit Spread VaR (CS VaR). The algebraic sum of these items gives the so-called Gross VaR (or non-diversified VaR), which, when compared with diversified VaR, makes it possible to quantify the benefit of diversifying risk factors resulting from holding portfolios on asset class and risk factor allocations which are not perfectly correlated. This information can also be analysed along all the dimensions referenced above.

The model enables the production of diversified VaR metrics for the entire Group in order to get an integrated overview of all the effects of diversification that can be generated among the various banks on account of the specific joint positioning of the various business units.

Moreover, scenario and stress-test analyses are regularly conducted on various risk factors with different degrees of granularity across the entire tree structure of the Group's portfolios and for all categories of instruments analysed.

Stress tests are used to assess the bank's capacity to absorb large potential losses in extreme market situations, so as to identify the measures necessary to reduce the risk profile and preserve assets.

Stress tests are developed on the basis of discretionary and trend-based scenarios. Trend-based scenarios are defined on the basis of previously-registered real situations of market disruption. Such scenarios are identified based on a time frame in which risk factors were subjected to stress. No particular assumptions are required with regard to the correlation among risk factors since trend-based data for the stress period identified has been measured.

Stress tests based upon discretionary scenarios assume extreme changes occurring to certain market parameters (interest rates, exchange rates, stock indices, credit spreads and volatility) and measure the corresponding impact on the value of portfolios, regardless of their actual occurrence in the past. Simple discretionary scenarios are currently being developed (variation of a single risk factor) as are multiple ones (variation of several risk factors simultaneously). Simple discretionary scenarios are calibrated to independently deal with one category of risk factors at a time, assuming shocks do not spread to the other factors. Multiple discretionary scenarios, on the other hand, aim to assess the impact of global shocks that simultaneously affect all types of risk factors.

It should be noted that the VaR methodology described above is, for operational purposes, also applied to the portion of the Banking Book consisting of financial instruments that are similar to trading instruments (eg. AFS bonds/Equity instruments).

The Group has implemented a backtesting procedure compliant with current regulations governing Market Risk as part of its own risk management system.

Backtesting refers to a series of tests conducted on VaR model results against day-to-day changes in the trading book value, with a view to assessing the model's forecasting capacity as regards the accuracy of risk metrics generated. If the model is robust, by periodically comparing the estimated daily VaR against daily trading losses from the previous day, the result should be that actual losses greater than the VaR occur with a frequency consistent with that defined by the confidence level.

Based on supervisory instructions (Bank of Italy Circular 263/06, as amended), the Risk Management Area considered it appropriate to apply the theoretical and actual backtesting methods and integrate these into the Group's management reporting system.

The first type of test (theoretical backtesting) has a stronger statistical significance in reference to measuring the accuracy of the VaR model ("uncontaminated test").

The second type of test (actual backtesting) meets the need for verifying the VaR model's forecasting reliability in reference to actual Bank operations (daily trading P&L) less the effect of any interest accrued between trading days t-1 and t on the securities and less the effect of fees and commissions.

These "clean" P&L results (the "actual P&L") are compared with the previous trading day VaR. If the losses are greater than those forecast by the model an "exception" is recorded.

Each bank of the MPS Group which is relevant as a market risk-taking centre contributes to the generation of interest rate risk and price risk in the overall Trading Book.

With reference specifically to the Parent Company, the Finance, Treasury & Capital Management Area (FTCMA) within the

CFO division is the Business Area in charge of trading. The Global Markets Division carries out trading activities for MPSCS.

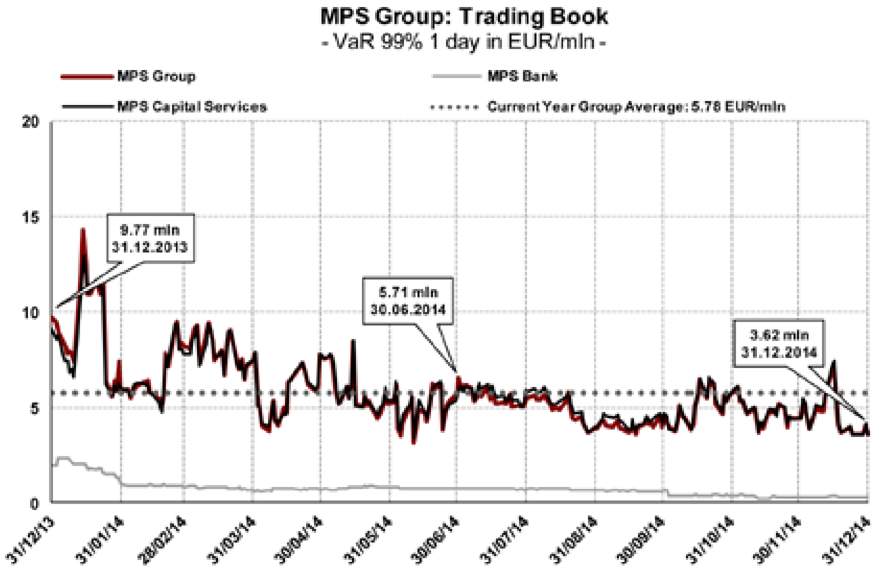
The FTCMA manages a proprietary portfolio which takes trading positions on interest rates and credit. In general, interest rate positions are taken by purchasing or selling bonds, and by creating positions in listed derivatives (futures) and OTCs (IRS, swaptions). Trading is carried out exclusively on the Bank's own behalf, with objectives of absolute return, in compliance with the delegated limits of monthly and yearly VaR and Stop Loss.

In particular, the FTCMA operates in the short-term portion of the main interest rate curves, mostly through bonds and listed derivatives.

With regard to credit risk in the trading book, the equity positions are generally managed through the purchase or sale of bonds issued by companies or by creating synthetic positions in derivatives. The activity is oriented to achieving a long or short position on individual issuers, or a long or short exposure on specific commodities. The activity is carried out solely on the Bank's own behalf with objectives of absolute return and in compliance with other specific issuer and concentration risk limits approved by the Board of Directors.

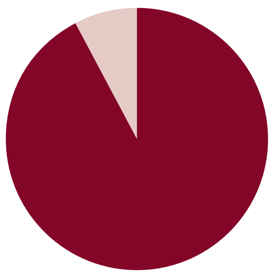
The Business Area in charge of the Parent Bank's trading activity with respect to price risk is the FTCMA which manages a proprietary portfolio and takes trading positions on equities, Stock Exchange indexes and commodities. In general, positions on equity securities are taken both through the purchase/sale of equities and through the positions created in listed derivatives (e.g. futures) and OTC (e.g. options). Trading is carried out exclusively on the Bank's own behalf, with objectives of absolute return, in compliance with the delegated limits of monthly and yearly VaR and Stop Loss. Similarly, the Global Markets Division carries out trading activities for MPSCS. For further information, please refer to the **Notes to the Consolidated Financial Statements**, *Part E – Information on risks and hedging policies – Section 2.1 – Interest Rate Risk and Price Risk – Regulatory Trading Book.*

During 2014, market risks in the Group's Regulatory Trading Book in terms of VaR showed a decreasing trend in volatility and absolute risk level compared to the previous year. VaR variability was affected primarily by the IR segment of the subsidiary MPSCS due to its trading activities, mostly in Long Futures and Interest Rate Future Options and by activities associated with MPSCS structuring and hedging of policies, also MPSCS.



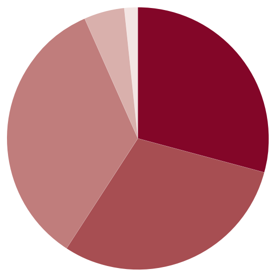
Ripartizione del VaR

MPS Group: Trading Book
VaR by Bank as at 31/12/2014



- MPS Capital Services; 92.3%
- MPS Bank; 7.7%

MPS Group: Trading Book
VaR by Risk Factor as at 31/12/2014



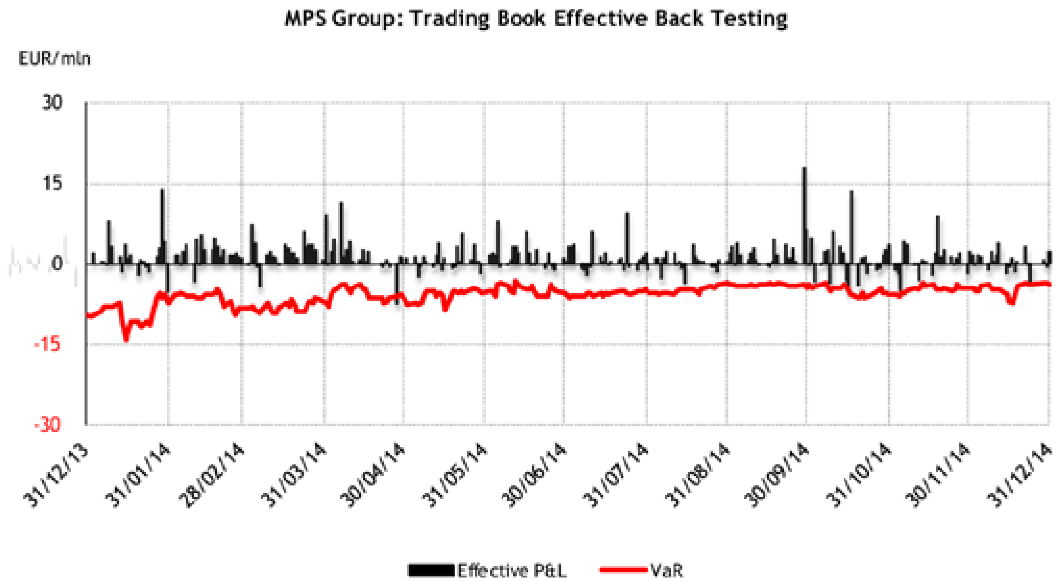
- CS VaR; 29.4%
- EQ VaR; 30%
- IR VaR; 34.2%
- FX VaR; 4.8%
- CO VaR; 1.6%

Group VaR

During 2014, the Group's VaR in the Regulatory Trading Book ranged between a low of EUR 3.18 mln recorded on 11.06.2014 and a high of EUR 14.33 mln on 14.01.2014 with an average value registered of EUR 5.78 mln. The Group's VaR stood at EUR 3.62 mln as at 31.12.2014.

MPS Group: Trading Book VaR PNV 99% 1 day in EUR/mln

	VaR	Data
End of Period	3.62	31/12/2014
Min	3.18	11/06/2014
Max	14.33	14/01/2014
Average	5.78	



The chart below shows the Actual Backtesting results of the internal Market Risks model in relation to the Group's Regulatory Trading Book for 2014. The backtesting shows only one exception during the year on the Group trading book, details of which are as follows:

- 16/10/2014: a negative day for the market (BTP-Bund spread +9 bps; EUR Swap 10y + 11bp) with significant effects on the trading book of the subsidiary MPS Capital Services.

Capital requirements relative to market risk are calculated according to the standard method for all Group entities. The table below shows the breakdown.

Tab. 7 – Capital requirement for Market Risk

Standardised Approach	
Position risk on debt instruments	173,170
Position risk on equity	75,456
Foreign exchange risk	29,734
Commodities risk	7,745
Total Standardised Approach	**286,106**
Total Market Risk	**-**
Total Concentration Risk	**3,036**
Total Market Risks	**289,141**

(*) Capital requirements under Specific Risk for positions with securitisations included in the Regulatory Trading Book amounted to EUR 4,636 (in thousands of Euro) for 2014

8. Exposure to interest rate risk on positions not included in the trading book

The Banking Book or Banking Portfolio consists of all exposures not falling within the Trading Book and, in accordance with international best practices, it refers to all of the Bank's commercial operations relating to the transformation of maturities with respect to balance-sheet assets and liabilities, Treasury, foreign branches, and hedging derivatives of reference. The definition of the scope of the Banking Book and the ALM centralisation process are set out in a resolution by the Board of Directors of the Parent Company in compliance with the framework described in the regulatory provisions (Bank of Italy Circ. 285). The framework sets the rules for the centralisation of Asset & Liability Management under the Parent Company's Finance, Treasury and Capital Management Area (FTCMA) and the definition and monitoring of operating limits for interest rate risk in the Group's Banking Book.

The Banking Book also includes bond receivables held for investment purposes, classified as either AFS or L&R. The same ALM rate risk metrics of measurement used for other accounts were also applied to this aggregate.

The operational and strategic choices for the Banking Book, adopted by the Finance and Liquidity Committee and monitored by the Risk Committee of the Parent Company, are based first and foremost on exposure to interest rate risk for a variation in the economic value of the assets and liabilities of the banking book by applying a parallel shift of 25bp, 100bp and 200bp, the latter in accordance with the requirements set out in the "second pillar" of Basel.

The risk measurements of the retail banks of the Montepaschi Group are calculated by using, among other things, a model for the valuation of demand items or core deposits, whose characteristics of stability and partial insensitivity to variations in interest rates are described in systems with a statistical/predictive model *(replicating portfolio)*, which takes into consideration a significant historical series of customer behaviours in the past.

In addition, the Montepaschi Group's ALM model includes within rate risk measurements, a behavioural model which takes into account the aspect of mortgage advance repayment *(prepayment risk)*.

The Montepaschi Group is committed to the continual updating of risk measurement methodologies by gradually fine-tuning estimation models so as to include all major factors that progressively modify the interest rate risk profile of the banking book.

In the course of 2013, the Group continued to carefully and constantly monitor its risk profile characteristics particularly in the light of existing contractual options and operating practices adopted, all of which make the risk profile more dependent on market performance, interest rates and their volatility.

The Group adopts a rate risk governance and management system which, in accordance with the provisions of the Supervisory authority, avails itself of:

- a quantitative model, which provides the basis for calculation of risk indicators for the interest rate risk exposure of the Group and Group companies/entities;
- risk monitoring processes, aimed at the ongoing verification of compliance with the operational limits assigned to the Group overall and to the individual business units;
- risk control and management processes, geared toward bringing about adequate initiatives for optimising the risk profile and activating any necessary corrective actions.

As part of the above system, the Parent Company has opted to centralise the responsibility for defining the policies aimed at managing the Group's Banking Book and controlling its related interest rate risk.

Tab. 8 – Exposure to interest rate risk in the Banking Book

Shift (+/-)	Effect on Economic Value (values in €/mln)		Effect on Net Interest Income (values in €/mln)
	dec-14	dec-13	dec-14
Eur +200bp	-1,412.24	-1,552.96	65.64
Usd +200bp	-5.20	-4.46	8.05
Altro +200bp	1.30	2.53	1.51
Total +200bp	**-1,416.14**	**-1,554.90**	**75.20**
Eur -200bp	724.69	1,458.67	-14.40
Usd -200bp	40.92	3.53	-0.92
Altro -200bp	1.54	-0.69	0.03
Total -200bp	**767.15**	**1,461.51**	**-15.28**

The amount of economic value at risk is, in any case, below the level considered as a critical threshold by current regulations.

The measure of sensitivity of net interest income refers to a parallel and instantaneous shock in the rate curve of +/-200 basis points. The gapping period is 12 months. The simulation model for net interest income sensitivity includes and assesses the mismatch generated by the trading book (via replication of the loan on the banking book). It shows how the measure of sensitivity to net interest income only expresses the effect of interest rate changes on the items under analysis. Assumptions regarding future trends in assets and liabilities are thus excluded and, therefore, cannot be considered as a predictor of level of net interest.

The sensitivity of the Montepaschi Group, at the end of 2014, suggests a profile of exposure to rate hike risk. With a shift of +200 bp in the interest rate curve, total sensitivity of the economic value stands at -1,416.14 Eur/mln, a decrease compared to the end of 2013.

Risk is almost entirely allocated to exposures denominated in Euros. For further information, please refer to the **Notes to the Consolidated Financial Statements**, *Part E – Information on risks and hedging policies – Section 2.1 – Interest Rate Risk and Price Risk – Banking Book*.

9. Exposures in equities not included in the trading book

Exposures in equity instruments are held by the Group for strategic purposes (group investments, associates and joint ventures), institutional purposes (investments in trade associations, local entities and institutions), purposes functional to the bank's business and the development of commercial business and financial investment purposes (limited to the investments associated with the merchant banking business of MPS Capital Services). Other investments exist, which are no longer considered as strategic and that are being sold, as well as investments in companies in liquidation.
Equity exposures included in the Banking book are classified for balance sheet purposes under available-for-sale financial assets and equity investments.

Measurements and accounting criteria

Assets available for sale

Classification criteria

This category includes non-derivative financial assets which are not classified as loans, financial assets designated at fair value through profit and loss or financial assets held to maturity. In particular, this category also comprises strategic equity investments which are not managed for trading purposes and cannot be defined as controlling interest, investment in an associate and joint control, and bonds which are not subject to trading. Such investments may be transferred for any reason, such as need for liquidity or variations in interest rates, exchange rates, or stock price.

Recognition criteria

Financial assets represented by debt or equity securities are initially booked at the settlement date, whereas receivables are initially booked as of the disbursement date. On initial recognition, the assets are reported at their fair value which normally corresponds to the price paid, inclusive of transaction costs or income directly attributable to the instrument. if recognition occurs as a result of reclassification from assets held to maturity, the value at which the assets are booked is represented by the fair value as of the date of transfer. In the case of debt instruments, any difference between the initial value and the value of repayment is posted to P&L and spread out over the life of the debt instrument in accordance with the method of amortised cost.

Measurement criteria

After initial recognition, financial assets available for sale are measured at fair value, with interest being recognised in the income statement as resulting from the application of the amortised cost and with appropriation to a specific net equity reserve of the gains or losses arising from changes in fair value net of the related tax effect, except losses due to impairment. Foreign exchange fluctuations in relation to non-monetary (equity) instruments are posted to the specific net equity reserve, whereas changes in monetary instruments (loans/receivables and debt instruments) are allocated to profit and loss. Equities, for which it is not possible to determine a reliable fair value, are maintained at cost, adjusted for any impairment losses. Financial assets available for sale are reviewed for objective evidence of impairment at each balance sheet and interim reporting date. Indicators of a likely impairment are, for instance, significant financial difficulty of the issuer, non-fulfilment or defaults in payments of interest or principal , the possibility that the borrower is declared bankrupt or submitted to other forms of insolvency proceedings, the disappearance of an active market for the assets. In particular, as far as equity instruments that have a quoted market price in an active market are concerned, a market price as at the date of the financial statements lower than the original purchasing cost of at least 30% or a market value lower than the cost lasting more than 12 months are considered an objective evidence of value reduction. If further reductions take place in subsequent financial years, these are charged directly to the profit and loss statement. With regard to debt securities, regardless of whether or not these are listed on active markets, any impairment loss is recognised in the profit and loss statement strictly in relation to the issuer's ability to fulfil its obligations and therefore make the necessary payments and repay capital at maturity. Therefore, it needs to be established whether there are indications of a loss event which could have a negative impact on estimated future cash flows. Where there are no actual losses, no loss is recognised on the stock, and any capital loss is recognised in the negative net equity reserve. Any writedowns recognised as a result of the impairment test are booked to the profit and loss statement as an operating expense. If the reasons for impairment cease to exist, following an event which occurred after recognition of impairment, writebacks are recognised in equity in the case of equity instruments, and through profit and loss in the case of debt securities.

Derecognition criteria

Financial assets are derecognised from the balance sheet when the contractual rights to the cash flows derived from the assets expire or when the financial asset is sold and virtually all of the risks and rewards in relation thereto are transferred. Securities received within the scope of a transaction that contractually provides for subsequent sale are not recognised in the financial statements, and securities delivered within the scope of a transaction that contractually provides for subsequent repurchase are not derecognised from the financial statements. Securities received within the scope of a transaction that contractually provides for subsequent sale are not recognised in the financial statements, and securities delivered within the scope of a transaction that contractually provides for subsequent repurchase are not derecognised from the financial statements. Consequently, in the case of securities acquired with an agreement for resale, the amount paid is recognised in the financial statements as loans to customers or banks, while in the case of securities transferred with an agreement for repurchase, the liability is shown under deposits from customers or deposits from banks.

Criteria for reporting of income and expenses

Upon disposal, or exchange with other financial instruments or measurement of a loss of value following impairment testing, the fair value results accrued to the reserve for assets available for sale are reversed to profit and loss under:

account "100 - Gains/losses on purchase/ disposal of: b) financial assets available for sale", in the case of disposal;

account "130 - Net impairment losses/ reversals" on: b) financial assets available for sale", in the case of recognition of impairment.

If the reasons for impairment cease to exist, following an event which occurred after the impairment was recognised, the impairment loss is appropriately reversed: through profit and loss in the case of loans or debt securities, and through net equity in the case of equity instruments.

Equity investments

Classification criteria

The Group considers as associates, that is subject to significant influence, the companies of which it holds at least 20 per cent of the voting rights (including potential voting rights) and in which it has the power to participate in determining the financial and operating policies. Similarly, companies are considered associates also when the Group – despite a lower percentage of voting rights– has the power of participating in the determination of the financial and operating policies of the investee on account of specific legal agreements such as, for example, the participation in important committees of the investee as well as the presence of vetoing rights on significant decisions.

The Group considers jointly controlled those companies with respect to which the following circumstances occur simultaneously:

- a written agreement is in place providing for participation in the management of the investee's business through the presence in the latter's Board of Directors;
- none of the parties to the agreement holds exclusive control of the investee;
- the decisions on key activities are made unanimously by the identified parties (each has an implicit or explicit veto power on key decisions).

Recognition criteria

The account includes equity investments held in associates and in joint ventures: these investments are initially recognised at purchase cost.

Revenue recognition and measurement criteria

In consideration of the above, this item broadly contains the valuation of equity investments using the equity method; this method provides for initial recognition of the investment at cost and its subsequent adjustment on the basis of the share of the investee's profits and losses made after the date of purchase. The pro-rata amount of the profit/loss for the period of the investee is posted to item 240 "Gains/losses on investments" in the consolidated profit and loss statement.

If evidence of impairment indicates that there may have been a loss in value of an equity investment, then the recoverable value of the investment (which is the higher of the fair value, less costs to sell, and the value in use) should be estimated. The value in use is the present value of the future cash flows expected to be derived from the investment, including those arising from its final disposal. Should the recoverable value be less than its carrying value, the difference is recognised in profit or loss under account "240 - Gains (losses) on equity investments".

Should the reasons for impairment no longer apply as a result of an event occurring after the impairment was recognised, reversals of impairment losses are credited to the same account in profit and loss.

Derecognition criteria

Investments are derecognised from the balance sheet when the contractual rights to the cash flows derived from the assets expire or when the financial asset is sold and virtually all of the risks and rewards in relation thereto are transferred. If a company is committed to a plan to sell a subsidiary that involves loss of control over said subsidiary, all the subsidiary's assets and liabilities should be reclassified as assets held for sale, regardless of whether the company will retain a non-controlling interest after the sale.

Tab. 9 – Exposures in equities not included in the trading book

Type of exposure / values	*Amounts as at 31.12.2014*								
	Book value		Fair value		Market value	Gains / losses realized		Gains / losses not realized and recognized in net assets	
	Level 1	Level 2/3	Level 1	Level 2/3	Level 1	Profits	Losses	Plus (+)	Minus (-)
A. Equity investments	60,097	774,800	116,189	X	116,189	83,801	-14	X	X
B. Financial assets available for sale	15,493	326,104	15,493	326,104	15,493	65,469	-6	11,188	-27,631

X = not attributable value
The item Equity Investments also includes the investment in Agricola Merse classified under assets held for sale in the balance sheet in the amount of EUR 5M.
The item Financial Assets available for sale includes AFS investments classified under assets held for sale in the balance sheet in the amount of EUR 16.6M.
The table illustrates exposures in capital instruments broken down by the respective accounting portfolio. Values refer to the exposures included in the Banking Book and do not include exposures in capital instruments which are deducted for the calculation of Regulatory Capital.

10. Encumbered and unencumbered assets

Shown below is information regarding encumbered and unencumbered assets on the basis of the guidelines and templates issued by the EBA on 27 June 2014, in accordance with the provisions of Part eight, Title II of EU Regulation (CRR 575/2013).

Tab. 10 – Assets encumbered and unencumbered

Template A-Assets

		Carrying amount of encumbered assets 010	Fair value of encumbered assets 040	Carrying amount of unencumbered assets 060	Fair value of unencumbered assets 090
010	**Assets**	72,502,923		110,992,178	
030	Equity instruments	45,307	45,307	1,409,633	1,409,633
040	Debt securities	28,928,495	28,800,746	1,780,247	1,726,540
120	Other assets	787,306		13,507,756	

Template B-Collateral received

		Fair value of encumbered collateral received or own debt securities issued 010	Fair value of collateral received or own debt securities issued available for encumbrance 040
130	**Collateral received**	6,590,484	24,284,499
150	Equity instruments	977,581	1,653
160	Debt securities	5,235,807	24,260,982
230	Other collateral received	377,096	21,864
240	**Own debd securities issued other than own covered bonds or ABSs**	9,057,729	4,058,854

Template C-Encunbered assets/collateral received and associated ßliabilities

		Matching liabilities, contingent liabilities or securities lent 010	Assets, collateral received and own debt securities issued other than received bonds and ABSs encumbered 030
010	**Carrying amount of selected financial liabilities**	72,590,038	88,151,135

Value to be not valorized

11. Exposures to securitisation transactions

11.1 Exposure to securitisation transactions: general comments

The Group operates in the securitisation market both as an originator, through the issue of notes from originated securitisations, and as an investor through subscription of securities from third-party securitisations.

As at today, the Montepaschi Group has not sponsored any securitisation transactions.

Originated securitisations include:

- securitisation transactions structured with the aim of deriving economic advantages regarding the optimisation of the loan portfolio, the diversification of sources of funding and the reduction of the cost of funding and the alignment of the natural maturities of assets and liabilities (securitisation transactions in the strict sense);
- securitisations aimed at strengthening the available funding sources, through the conversion of the loans sold into securities that can be refinanced (self-securitisations). Self-securitisation transactions are part of the more general policy of strengthening the group's liquidity position and are not included in securitisations of a stricter sense since they do not transfer risk outside the Group.

For this reason, the numerical data concerning these transactions are not included in the tables under the quantitative section.

Securitizations in the strict sense of the term

In general this type of transaction involves the spin-off of a package of assets (generally loans) recognised in the balance sheet of Group Banks and its subsequent transfer to a Special Purpose Entity. The SPE, in turn, finances the purchase through the issue and placement of securities exclusively guaranteed by the assets received (ABS – Asset-Backed Securities). Resources raised in this way are returned to the Montepaschi Group (the seller), whereas commitments to subscribers are met using the cash flows generated by the loans sold. Following is an outline of the Group's main securitisation transactions (of the traditional type, as the Group has not engaged in any synthetic securitisations) originated in previous years and outstanding at 31 December 2013 - broken down into quality/type of underlying and vehicle company:

- securitisation of **performing loans**:
  - Spoleto Mortgages Srl (2003, BP Spoleto);
  - Siena Mortgages 10-7 Srl (2010, BMPS);
  - Casaforte Srl (2010, BMPS);
  - Siena Consumer (2013, Consum.it);
- securitisation of **other assets**:
  - Gonzaga Finance Srl (2000, BAM), currently being closed.

Spoleto Mortgages Srl

Spoleto Mortgages Srl is a securitisation which was originated by Banca Popolare di Spoleto (BP Spoleto), a subsidiary of the Parent Company Banca MPS until 5 July 2013. As of this date, the shareholders' agreement with the cooperative company Spoleto-Credito e Servizi Società Cooperativa concerning the bank's shareholding (for a total of 22.972.924 ordinary shares) in Banca Popolare di Spoleto SpA was terminated with the latter being subsequently removed from the MPS Group's area of consolidation. Consequently, the securitisation Spoleto Mortgages Srl is no longer included among own securitisations but among third-party securitisations. The securitisation of Spoleto Mortgages Srl performing loans shows a residual debt of EUR 0.018 bn as at 31/10/2014 and on 25 November 2014 the vehicle company reimbursed 99.11% of the related senior notes.

The securitisation, Gonzaga Finance Srl, a company under Luxembourg law, is currently under closure. The securitization of securities was originated by Banca Agricola Mantovana SpA.

In the course of 2010, in light of the European ABS market recovery and with a view to achieving economic benefits through reserves management, two additional securitisations were completed through the vehicles, Casaforte Srl and Siena Mortgages 10-7 Srl. All outstanding securitisations, except for Siena Mortgages 10-7, entail the derecognition of the underlying assets (see following section "Accounting Policies")

Siena Mortgages 10-7 S.r.l

This securitisation transaction was carried out on 30 September 2010. Its portfolio contained 34,971 BMPS performing, real estate backed loans for a total outstanding debt of approx. Euro 3.5 bn. The special-purpose vehicle Siena Mortgages 10–7 is 93% owned by Stichting Canova, a foundation incorporated under Dutch law, and the remaining part is owned by the Parent Company.

The vehicle structure ensures its independence. The remaining debt balance amounted to EUR 2.5 bn as at 31/12/2013..

On 22 November 2010, Siena Mortgages 10-7 financed purchasing of the portfolio by issuing Residential Mortgages Backed Floating Rate Securities in the following tranches:

Securities	Rating Fitch/ Moody's	Total consideration (€/million)
A1 Senior	AAA/Aaa	595,00
A2 Senior	AAA/Aaa	400,00
A3 Senior	AAA/Aaa	1.666,90
B Mezzanine	NR /Caa1	817,60
C Junior	NR/NR	106,63

Classes A1 and A2 were placed with market investors, whereas the remaining classes of notes issued by the vehicle were underwritten by the Parent Company. The deal has not entailed the derecognition of the underlying assets from the balance sheet of the Parent Company (transferor), which has substantially retained all risks and rewards associated with the property of the assets sold. An offsetting entry for the cashflows arising from the disposal of tranche A1, A2 was posted on the liabilities side of the balance sheet. The A1/A2/A3 senior notes currently have a rating of A2/AA+ (Moody's/ Fitch).

Casaforte Srl

With a view to enhancing part of the Group's properties used in the business, the Parent Company formalised an additional securitisation transaction for an amount of Euro 1.7 bn on 21 September 2010. The transaction was completed at the end of December in the same year with the transfer of receivables arising from a mortgage loan granted to the consortium company "Perimetro Gestione Proprietà Immobiliari", to vehicle Casaforte srl. As at 31/12/2013, the total outstanding debt amounted to Euro 1,4 bn.

On 22 December, the vehicle Casaforte Srl (with share capital entirely held by Stichting Perimetro and registered offices in Amsterdam) issued asset backed securities (classes A, B and Z) in the following tranches:

Securities	Rating Fitch	Total consideration (€/million)
A	A-	1.536,64
B	NR	130,00
Z	NR	3,00

Class B and Z notes are not offered to the public. They were placed with professional and/or qualified investors. The securitisation-underlying assets were derecognised in their entirety from the balance sheet of the Parent Company, since all of the risks and rewards associated thereto were transferred to the vehicle in both form and substance.

The subsidiary MPS Capital Services holds Class A and B notes in its portfolio. At the end of December 2013, the MPS Group acquired control of 'Perimetro Gestione Proprietà Immobiliari' and 'Casaforte'. The acquisition of control was completed by way of a two-step purchase of 100% of Equity Instruments issued by Perimetro and Class Z notes issued by Casaforte for an approximate EUR 70 mln. The transactions are part of the activities planned for the restructuring of the 'Chianti Classico' trade, outlined in the Parent Company's Restructuring Plan and approved by the Board of Directors on 7 October 2013 and subsequently by the European Commission on 27 November 2013.

Siena Consumer Srl

This securitisation transaction was carried out in 2013 through the sale to the vehicle "Siena Consumer Srl" of a portfolio consisting of 200,542 personal loans, autoloans, and special-purpose loans originated by Consum.it S.p.A. of approximately EUR 1.5 bn. As at 31/12/2014, the remaining debt balance amounted to EUR 957.1 mln (200,005 outstanding mortgages).

To finance the purchase of this portfolio, the Vehicle Company issued Residential Mortgage-Backed Securities (RMBSs, of which those in Class A were placed with institutional investors; the remaining classes were subscribed by the Originator.

Market placement of class A did not entail the derecognition of the underlying assets from the balance sheet of the Parent Company (transferor), which has substantially retained all risks and rewards associated with the property of the assets sold. Consequently, an offsetting entry for the cash flows arising from the disposal was posted on the liabilities side of the balance sheet.

Self-Securitisations

These transactions involve the transfer of a portfolio of loans originated by Group Banks to a Special Purpose Entity which, in turn, finances the purchase through the issue of Residential Mortgage- Backed Floating Rate Notes (also known as Residential Mortgage-Backed Securities or RMBS). All Residential Mortgage Backed Securities (RMBS) issued are underwritten by the Parent Company. Although the Group's full underwriting did not generate any direct cash flows from the market, it still provided the Group with securities that could be used for ECB refinancing and repo transactions, thereby improving the MPS's safety margin against the MPS Group's liquidity risk position. In fact, self-securitisations allow for liquidity requirements to be covered by optimising the amount of assets readily available. Securities that can be allocated with an AAA rating (eligible assets) represent the Group's main core for covering short-term obligations using instruments that can be readily liquidated. Within this logic, from 2007 to 2011 five self-securitisation transactions were carried out on performing loans for a total amount of Euro 20.1 bn and two self-securitisation transactions were carried out using the portfolio of loans to small and medium businesses issued by MPS Capital Services Banca per le Imprese Spa (MPS CS) and the Leasing portfolio of the subsidiary MPS Leasing & Factoring, for a total EUR 5.4 bn.

The two latter transactions were redeemed in 2014. Here follows a list of the self-securitisations as at 31 December 2014, which show a remaining debt of approximately EUR 7.6 bn:

- Self-securitisations of performing loans (mortgages):
  - · Siena Mortgages 07 -5 Srl (2007);
  - · Siena Mortgages 07 -5/Bis Srl (2008);
  - · Siena Mortgages 09 -6 (2009);
  - · Siena Mortgages 09 -6/Bis Srl (2009).

The first two transactions, involving performing residential mortgage loans were carried out in December 2007 (Euro 5.2 bn) and march 2008 (Euro 3.4 bn) for an overall amount of Euro 8.6 bn, through the vehicle, Siena mortgages 07-5 Srl.

In 2009, two new transactions were added (Euro 4.4 bn as at February 2009 and Euro 4.1 bn as at June 2009), involving performing loans for a total of approx. Euro 8.5 bn through the vehicle, Siena mortgages 09 – 6 Srl. These transactions have generated eligible assets for a total amount of Euro 5.8 bn at 31/12/2014.

The **Siena Lease 11 -1 securitisation,** which was carried out on 5 December 2011, was redeemed with economic effect effect as of 30 April 2014.

The transaction had been completed by MPS Leasing & Factoring with the disposal of a portfolio of 20,585 real-estate, motor vehicle and equipment leasing contracts entered into by natural persons residing in Italy and acting for purposes related to the usual course of business or companies having their registered office in Italy. The assets leased under these contracts, classified as 'performing' by the BMPS Group and with all instalments regularly paid as at the date of valuation (31 October 2011) amount to approximately Euro 2.3 bn, equal to the remaining debt balance. The vehicle, Siena Lease 11 – 1, was used as the transferee of the transaction underlying assets. 90% of the vehicle company was held by Stichting StarckTrek, a Foundation governed by Dutch law, while the remainder is held by Banca Monte dei Paschi di Siena.

The **Siena Sme 11 -1** securitisation was also redeemed with economic effect as of 31 October**.**

On 22 November 2011, MPS CS finalised the disposal of a portfolio of 3,494 real estate mortgages granted to Italian small- and medium-sized businesses, with all instalments regularly paid as at the date of valuation (1 November 2011) for an amount, equal to the remaining debt balance, of approx. Euro 3.0 bn. The vehicle, Siena Sme 11 – 1, was used as the transferee of the transaction underlying assets. 90% of the vehicle company was held by Stichting Trek, a Foundation governed by Dutch law, while the remainder is held by Banca Monte dei Paschi di Siena.

Self-securitisations do not contribute to the numerical data reported in the following tables of the quantitative disclosure, because - as was explained above - they do not constitute securitisations in the strict sense of the term.

Securitisation transactions completed in 2014

No new securitisation transactions were completed in 2014. The Group did, however, continue with its covered bond issuance programme as part of its objective to optimise liquidity.

Third-party securitizations

The Group allocates a part of its capital to stock market investments, with the objective to:

- attain a risk-adjusted return that is significantly higher than the cost of allocated capital so as to create value for the shareholders;
- diversify risks with respect to other risks that are typical of its business;
- maintain in-depth and up-to-date knowledge of financial market trends which additionally and inevitably condition the domestic markets in which the Group mainly operates.

Activities are overseen by the Finance, Treasury and Capital Management Area and are carried out within a broad and varied range of potential financial market areas so as to draw maximum benefit from risk diversification and reduced exposure to individual sectors: from investment activities in the government bonds, securities and forex markets to activities in the corporate bond and credit derivative markets.

Third-party securitisations are compliant with the above-mentioned process of diversification and with the support of a specialised desk within the subsidiary, Mps Capital Services. The investment process starts with the analyses carried out by the traders in a bottom-up logic and is included in the overall monitoring of portfolio risks. As with all operations in securities markets, these investments are subject to risk limits set by the Board of Directors that are monitored daily by the Business Control Units and Risk Management; Stop loss, risk and nominal limits are defined for maximum exposure for major issuer categories broken down by rating.

Methods for calculating risk weighted exposures

The MPS Group applies the standardized approach for calculation of the capital requirement for credit risk relating to securitised exposures included in the Banking Book.

The same approach is also used to calculate the capital requirement for market risk (specific risk) relating to securitised exposures included in the Trading Book for Regulatory purposes.

For this reason, risk-weighted exposure is calculated by applying a 'weight' depending on the ratings assigned by an External Credit Assessment Institution (ECAI) to the securitised exposures (in the banking book and trading book). The ECAIs used by the group for positions in short-term rated securitisations and securitisations other than those with a short-term rating, include:

Fitch Rating Ltd,

Moody's Investors Service Ltd,

Standard & Poor's Rating Services.

Type[(a)]	Rating agencies
PERFORMING LOANS	
SIENA MORTGAGES 10-7 (BMPS)	Fitch Rating Ltd Moody's Investors Service Ltd
SIENA CONSUMER (CONSUM.IT)	N.R. N.R.
CASAFORTE (BMPS)	Fitch Rating Ltd Moody's Investors Service Ltd
OTHER ASSETS	
GONZAGA FINANCE (BAM)	Moody's Investors Service Ltd Standard & Poor's Rating Services

(a) Originator in brackets.

Accounting policies

The accounting of securitisation transactions completed prior to the first-time adoption (FTA) of international accounting standards is not reported in the financial statements inasmuch as the Group has made use of the optional exemption provided for by IFRS 1, which permits not re-posting financial assets/ liabilities sold or derecognised prior to 1 January 2004. Therefore, loans underlying the transactions prior to the first-time-adoption of international accounting standards have been derecognised from the transferor's balance sheet. The relative junior securities underwritten have been classified among receivables. For transactions completed subsequent to the first-time-adoption of international accounting standards, where receivables were sold to vehicle companies and in which - even with formal transfer of legal ownership of the receivables - control over the cash flows deriving therefrom and most risks and rewards are maintained, the loans that are the object of the transaction are not eliminated from the transferor's balance sheet. In this case, a payable is posted with the vehicle company net of the securities issued by the company and repurchased by the seller. The profit and loss statement also reflects the same accounting criteria. related junior notes underwritten were classified among receivables. Thus, for the purposes of calculating capital absorption, the loans are maintained in the Group's weighted assets as if they had never been sold. The only exception among securitisations completed after F.T.A. (first-time adoption) and outstanding as at 31.12.2014 is Casaforte Srl, the underlying receivables of which were removed in their entirety from the Parent Company's balance sheet since the risks and rewards connected thereto were transferred to the vehicle company in both form and substance. From an accounting standpoint, self-securitisations do not entail the derecognition of underlying assets.

Control System and Top Management Reporting

The securitisation management process is supported by a specific internal procedure which assigns roles and responsibilities to the various organisational units involved in the individual phases of the process.

The Parent Company's ALM & Capital Management function establishes general practices and coordinates activities in relation to securitisation transactions. The Montepaschi Group set up a specific unit within the Parent Company's Specialised Processes and Services Area, responsible for determining the rules and criteria for the management of performing securitisations. More specifically, the Special-purpose Loans and Securitisations Service within this area sets the operational guidelines while looking after aspects and obligations associated with servicing activities.

The trend of the transactions is steadily monitored through the periodical (monthly and quarterly) recording of remaining principal repayment flows, default and bad debt positions generated by these securitisations.

In coordination with other originator Banks in the Group, the Special-Purpose Loans and Securitisations Service prepares summary reports on portfolios sold ("total reports"). In addition, as part of critical situation management, the ALM & Capital Management Service, notifies cases that may pose potential risks for noteholders to the relevant functions in the organisation.

In its capacity as third-level control body, the internal audit area uses sampling procedures to periodically validate:

- whether the degree of recoverability of loans sold is accurate and, as a result, whether the fair value of securities issued is appropriate;
- whether line checks assigned to the various units have been carried out and roles and responsibilities properly identified;
- it also verifies the compliance of reporting/accounting procedures with current regulations in collaboration with other units, as necessary;
- the existence of any conflicts of interest with respect to noteholders; and compliance, on a sampling basis, with the obligations of law 197/91, as amended.

Non-performing securitisations, on the other hand, are managed by the Debt Collection Area, while all activities connected with the securitisation of loans originated by other subsidiaries (in particular, Consum.it SpA and Mps Leasing&Factoring) are managed by the subsidiaries themselves.

Risk-hedging policies

With regard to monitoring procedures for risks inherent in own securitisations , the Bank uses the control tools already in place for portfolio risks. Pursuant to the provisions set out in the Supervisory Instructions Issued by the Bank of Italy on this subject, the Bank makes sure that the overall transactions are managed in compliance with the law and the prospectuses.

When transactions are structured, it is the responsibility of the ALM & Capital Management Service, in collaboration with the Arranger and liaising with the asset-holding unit, the Quality Control function and Risk Management, to submit to the approval of the Finance Committee the definition of the hedging strategy as well as the potential recourse to a back-to-back swap as a way to hedge against the risks of fluctuations in the interest rates of securitised assets.

With regard to procedures aimed at monitoring the risks of third party securitisations, the Bank uses the control tools and internal models implemented for the measurement and management of market risks in line with the qualitative and quantitative requirements set out by the regulatory authorities. In detail, the BoD-defined limits of the following are monitored: Stop loss, Value at risk (Var) and nominal limits of maximum exposure by issuer's product categories, broken down by rating classes. Finally, the appropriateness and quality of the market settings applied to Front Office and market risk management are monitored, as are the frequency and quality of upgrades.

Traditional securitisations and self-securitisations originated by the Group are also relevant for liquidity risk monitoring and management. Securitisations have been used by the Group in recent years primarily with a view to 'certificate' commercial assets, using hem for ECB refinancing transactions and collateralised securities lending. In order to maximise the efficiency and economic advantageousness of these transactions, some of the structuring roles required are generally carried out by the *originator bank* itself. In particular, the roles that are particularly relevant for the purpose of liquidity management include the following:

- Servicer: the originating entity, which manages the cash flows and usually maintains a direct relationship with its own customers, avoiding disclosure of the list of debtors sold to a third party entrusted with the collection of payments for -and daily management of- the portfolio in question;
- Account Bank**:** the entity that acts as a custodian of the securitisation liquidity, i.e. the depository bank for the collections that the servicer deposits on a daily basis;
- Swap counterparty**:** the direct counterparty for vehicles' interest rate risk hedging swaps.

To fulfil the above roles, the entity is required to comply with specific credit market requirements for the entire period in which the transaction is in place. To maintain the rating of its transactions, if the creditworthiness of the *originator* is downgraded to a rating below the minimum levels set out by the Rating Agencies, the originator will be required to put in place remedies which may expose it to liquidity risk. On a case by case basis it may, in particular, be necessary to collateralize or secure the credit exposure arising from the role itself or replace it with a third institution. Consequently, a downgrade has significant repercussions on the originating banks in terms of liquidity risk, due both to higher collateral required to maintain the typical roles of these transactions in place and the cost for outsourcing part of these roles.

More specifically:

in order to maintain the role of Servicer, if the bank's rating is downgraded to below the levels set out by the rating agencies, it will be required to fund a reserve, known as the **commingling** reserve which, should a default occur, will provide hedging against the risk that the amounts collected on behalf of the vehicle and not yet credited to the vehicle's accounts may fall into the funds available for the general body of creditors of the bankrupt bank;

for the role of Account Bank, Rating Agencies may require a third bank to be entrusted with the custody of the vehicles' financial assets, thus generating strong liquidity losses;

for the role of Swap Counterparty, if credit scoring is below a certain level, Agencies may require either replacement of (or a guarantee from) the counterparty or specific collateralization. Externalisation or derivative guarantee may instead be imposed by the agencies if creditworthiness is below a certain limit threshold.

Covered Bond Transactions

The MPS Group currently has two Covered Bond programmes for a total of Euro 30 bn. In the course of 2010, the Montepaschi Group launched a first programme for the issuance of Covered Bonds for an amount of Euro 10 bn with a view to improving the mid-long term financial profile.

In light of the developments in the financial markets, the programme should be considered as part of a wider strategy, aimed at:

- curbing the costs of funding: covered bonds are widely preferred, inasmuch as they are issued directly by the bank and their repayment is guaranteed by a segregated pool of assets (in this case, residential mortgage loans); in the event of issuer bankruptcy, covered bond holders enjoy a right of recourse on a portfolio of segregated high-quality assets and are, therefore, willing to accept a lower yield than the one offered by similar uncovered bonds;
- diversifying the bank's funding sources on the international market too;
- lengthening its average debt maturity profile.

Subsequently, with a view to improving the efficiency and stability of the Group's counterbalancing capacity, in 2012 a second issuance programme was authorised for a maximum of Euro 20 bn. The covered bonds were not explicitly rated when launched but, in the course of 2013, were assigned a rating (A) by the agency DBRS. The second programme is not intended for the market but for transactions eligible as collateral in refinancing transactions through the European Central Bank.

These transactions are structured into the following stages:

a) the Parent Company, or other Group Company, transfers, without recourse, a pool of assets having certain characteristics to the vehicle, MPS Covered Bond S.r.l. and MPS Covered Bond 2 S.r.l, thus forming a segregated *Cover Pool*;

b) the Transferor grants a subordinated loan to the vehicle, for the purpose of financing payment of the assets' purchase price by the vehicle;

c) the Parent Company issues covered bonds secured by an autonomous, irrevocable and unconditional first demand guarantee issued by the vehicle for the only benefit of the bond-holding investors and senior debtors involved in the transaction; the guarantee involves limited recourse to the assets of the Cover Pool owned by the vehicle (guarantor).

The structure of the deal is such that the Parent Company is the transferor (a), lender (b) and issuer (c) in the transaction.

In order to allow the transferee to meet the obligations of the collateral pledged, the Parent Company uses appropriate Asset & Liability Management techniques to secure a trend of substantial balance between the maturities of cash flows arising from the assets sold and maturities of payments due in relation with the covered bonds issued and other costs of the transaction. The programmes, in both cases, were structured in compliance with applicable rules and regulations which authorise the issuance of covered bonds only if the transferring and issuing banks meet certain capital requirements.

The structure of the debt issuance programmes of the Parent Company (transferor and servicer) is subject to stringent regulatory requirements and calls for continuous actions by the Specialised Credit Processes and Services Area; Finance, Treasury & Capital Management and Risk Management Areas, as well as supervision by an external auditor (Deloitte & Touche) as asset monitors. In particular, these actions include:

- assessment of capital requirements mandated by Supervisory Instructions when it comes to covered bond issuance programmes;
- assessment of the quality and integrity of assets transferred with regard, in particular, to the estimated value of properties, both residential and non-residential, on which a mortgage in relation with the asset-backed loans is placed; this assessment may result in repurchases, integrations and additional transfers of supplemental assets;
- assessment of an appropriate ratio being maintained between bonds issued and assets transferred as collateral (Cover Pool -mortgage and residential assets; commercial assets for the second programme);
- assessment of transfer limits and integration practices;
- assessment on whether risks are effectively and adequately hedged by derivative contracts in relation to the transaction.

In the course of 2013, the mitigation strategy for interest rate risk on the first Programme was restructured in order to minimise the Vehicle's exposure to market counterparties. In particular, the newly-defined strategy aims to only cover the Vehicle's net exposure to interest rate risk, as opposed to the nominal amount.

In order to support the issuances of Covered Bonds in the first programme, the Parent Company transferred a portfolio of approximately 155 thousand mortgages for a total value of Euro 15.8 bn, consisting in performing residential mortgages in real estate and building secured by 1st mortgages and with all instalments regularly paid as at the date of valuation of the portfolio.

Details of the portfolio sold are reported below:

Loans	Portfolio	Loans number	Amount (€/bln)
21/05/10	Loans BMPS	36.711,00	4,4
19/11/10	Loans BMPS	19.058,00	2,4
25/02/11	Loans BMPS	40.627,00	3,9
25/05/11	Loans BMPS (ex BAV)	26.804,00	2,3
16/09/11	Loans BMPS	27.973,00	2,3
14/06/13	Loans BMPS	4.259,00	0,4
Total		**155.432,00**	**15,8**

In covered bond issuances, it is not the vehicle but MPS that issues securities directly.

In the course of 2014, as part of its first issuance programme, the Parent Company completed 7 issuances of Covered Bonds for a total amount of EUR 4.3bn; currently, there are 6 issuances for a total of EUR 3.9bn.

Total issuances as at 31 12 2014 stood at EUR 8.3 bn, of which EUR 2.9 bn in "retained" issuances used as collateral for ECB refinancing transactions or other forms of secured financing, and EUR 5.450bn in "public" issuances, intended for institutional investors.

As part of the second programme, the Parent Company transferred a portfolio of approximately 95 thousand mortgages for a total value of around EUR 13.6 bn to support fourteen issuances for a total of EUR 8.1 bn.

The portfolio sold consists of real estate-backed, residential and commercial mortgage loans, receivables from -or guaranteed by- the Public administration and securities issued as part of securitisations consisting in these same types of loans and receivables. Details are reported in the table below:

Loans	Portfolio	Loans number	Amount (€/bln)
27/04/12	Residential Mortgages	27.047	2,38
22/06/12	Residential and Commercial Mortgages	13.993	2,48
24/08/12	Residential and Commercial Mortgages	17.353	1,40
21/09/12	Residential and Commercial Mortgages	9.870	2,47
15/02/13	Residential and Commercial Mortgages	9.033	1,29
21/06/13	Residential and Commercial Mortgages	12.771	2,15
29/03/14	Residential and Commercial Mortgages	5.645	1,46
Total		**95.712**	**13,6**

Management of the new Covered Bond Programme follows the proven processes and controls already adopted for management of the covered bonds Programme established in 2010.

The covered bonds issued as part of the second programme were not intended for the market but repurchased by the bank and used as collateral for refinancing transactions in the Eurosystem. Euro 8.1 bn currently remains outstanding following the Parent Company's repurchase of 1 issuance in 2014 for a total of Euro 600 mln.

Details of the fourteen issuances are shown below:

Issuer Date	Legal Maturuty	Interest Rate	Ammontare (€/bln)
21/06/12	ott-15	Adjustable Euribor 3m+1,4%	0,6
10/07/12	gen-16	Adjustable Euribor 3m+1,4%	0,8
10/07/12	apr-16	Adjustable Euribor 3m+1,4%	0,8
10/07/12	lug-16	Adjustable Euribor 3m+1,5%	0,6
05/09/12	ott-16	Adjustable Euribor 3m+1,5%	0,7
05/09/12	gen-17	Adjustable Euribor 3m+1,5%	0,7
28/09/12	apr-17	Adjustable Euribor 3m+1,5%	0,7
28/09/12	lug-17	Adjustable Euribor 3m+1,5%	0,7
28/09/12	ott-17	Adjustable Euribor 3m+1,5%	0,7
26/02/13	gen-17	Adjustable Euribor 3m+1,5%	0,8
26/02/13	mag-17	Adjustable Euribor 3m+1,5%	0,7
04/09/13	lug-17	Adjustable Euribor 3m+1,6%	0,4
04/09/13	ott-17	Adjustable Euribor 3m+1,6%	0,2
12/11/14	gen-18	Adjustable Euribor 3m+1,0%	0,3
Total			**8,7**

From an accounting viewpoint, both covered bond transactions did not involve the derecognition of assets sold and consequent recognition in the balance sheet of swaps connected with the transaction. It should be noted that:

- transferred loans continue to be reported in the Parent Company's balance sheet inasmuch as the Parent Company retains the risks and rewards of ownership of the loans transferred;
- the loan disbursed by the Parent to the Vehicle is not classified as a separate item in the balance sheet, since it is offset with the amount due to the Vehicle in which the initial transfer price was recognised. The loan, therefore, is not subject to credit risk assessment, because this risk is entirely reflected in the assessment of transferred loans, which continue to be reported in the Parent Company's balance sheet;
- loans are subject to movements based on own events (figures and assessment);
- instalments collected by the Parent (which also acts as a servicer) are reallocated daily to the Vehicle's "collection account" and accounted for by the Parent as follows:
    - collection of principal from borrower is recognised as an offsetting entry to the reduction in the loan to the borrower;
    - reallocation of principal to the Vehicle is recognised as an offsetting entry to the recognition of a loan to the Vehicle; this loan is paid off upon repayment of the subordinated loan;
    - interest received by borrower is recognized as an offsetting entry to account 10 "Interest income: loans to customers" (interest on loans continues to be recognised on an accrual basis);
    - reallocation of interest to the Vehicle is recognised as an offsetting entry to the recognition of a loan to the Vehicle;
    - this loan is paid off upon collection of the receive leg of the Cover Pool Swap.
- the Vehicle "MPS Covered Bond S.r.l." is invested in by the Parent Company for a control stake of 90%, recognised under account 100 "Equity investments" and included in the Group's consolidated financial statements under the comprehensive approach;
- the vehicle "MPS Covered Bond 2 S.r.l." is invested in by the Parent company for a control stake of 90%, recognised under Account 100 "Equity investments" and included in the Group's consolidated financial statements under the comprehensive approach;
- bonds issued are posted to Account 30 "debt securities in issue" on the liabilities side, and related interest expense is recognized on an accrual basis.

11.2 Exposure to securitisation positions

Tab. 11.2.1 – Exposures securitised by the MPS Group

Type of Assets/Exposures securitised	Exposure		Losses for the period
	net	of which impaired	
RMBS	**3,954,804**	**40,373**	**-**
Non-performing loans	-	-	-
Ulisse 4 (Banca Popolare Spoleto - repurchase 5/11/2013)	-	-	-
Mortgages	3,954,804	40,373	-
Mantegna Finance II (BAM - repurchase 5/8/2013)	-	-	-
Casaforte Srl (Banca MPS)	1,414,350	-	-
Siena Mortgages 10 -7 (Banca MPS)	2,540,454	40,373	-
ABS	**957,104**	**10,065**	**-**
Consumer Credit	957,104	10,065	-
Siena Consumer (Consum.it)	957,104	10,065	-
CDO	**-**	**-**	**-**
Bonds and credit derivatives	-	-	-
Gonzaga Finance (BAM)	-	-	-
Total as at 31/12/2014	**4,911,908**	**50,438**	**-**
Total as at 31/12/2013	**5,665,758**	**17,867**	**-**

Reported below are the assets underlying the securitizations originated by the Bank, included in the Banking Book and Trading Book. These securitizations involve total derecognition of underlying assets from an accounting viewpoint, with the exception of Siena Mortgages 10 – 7 e Siena Consumer.
The securitization Ulisse 4, originated in 2001 by Banca Popolare di Spoleto which, as of 2013 is no longer included in the MPS Group's scope of consolidation, was redeemed on 5 November novembre 2013.
The Group has not issued any synthetic securitizations so far.

Tab. 11.2.2 – Total Securitised Exposures by type of Securities(*) (On and Off-Balance sheet)

	Securitisations		Total
	own	of third parties	
1. Balance-sheet exposures	**843,044**	**99,484**	**942,528**
Banking Book	**6,915**	**49,994**	**56,909**
CBO	4,094	-	4,094
CDO di ABS	-	49,994	49,994
CLO	2,821	-	2,821
Regulatory Trading Book	**836,129**	**49,490**	**885,619**
CBO	64,086	-	64,086
ABS	-	20,675	20,675
CDO	-	2,273	2,273
CMBS	772,043	2,730	774,774
RMBS	-	23,812	23,812
2. Off-balance-sheet exposures	**-**	**-**	**-**
Totale as at 31/12/2014	**843,044**	**99,484**	**942,528**
Totale as at 31/12/2013	**409,642**	**881,649**	**1,291,291**

(*) Asset types are defined in the Glossary.

Tab. 11.2.3 – Own securitised exposures by type of securities and underlying assets – Banking Book

	Junior	Mezzanine	Senior	Total
CBO	**4,094**	**-**	**-**	**4,094**
Bond	4,094	-	-	4,094
CLO	**2,821**	**-**	**-**	**2,821**
Non-residential Mortgages	2,821	-	-	2,821
Total as at 31/12/2014	**6,915**	**-**	**-**	**6,915**
Total as at 31/12/2013	**2,815**	**-**	**-**	**2,815**

Of the exposures shown as at 31/12/2014, only EUR 4,094 is included in the calculation of prudential requirements reported in Tables 10.3.1 and 10.3.2.

Tab. 11.2.4 – Third-party securitised exposures by type of securities and underlying assets – Banking Book

	Junior	Mezzanine	Senior	Total
CDO di ABS	**-**	**-**	**49,994**	**49,994**
Financial	-	-	49,994	49,994
Totale as at 31/12/2014	**-**	**-**	**49,994**	**49,994**
Totale as at 31/12/2013	**3,559**	**17,909**	**791,935**	**813,404**

Tab. 11.2.5 – Own securitised exposures by type of Securities and underlying assets – Trading Book

	Junior	Mezzanine	Senior	Total
CBO	**-**	**-**	**64,086**	**64,086**
Bond			64,086	64,086
CLO	**-**	**115,482**	**656,561**	**772,043**
Non-residential Mortgages	-	115,482	656,561	772,043
Totale al at 31/12/2014	**-**	**115,482**	**720,647**	**836,129**
Totale as at 31/12/2013	**-**	**93,348**	**313,480**	**406,827**

Of the exposures shown, none are included in the calculation of prudential requirements reported in Tables 11.2.10 and 11.2.11.

Tab. 11.2.6 – Third-party securitised exposures by type of Securities and underlying assets – Trading Book

	Junior	Mezzanine	Senior	Total
ABS	**-**	**-**	**20,675**	**20,675**
Consumer Credit	-	-	20,675	20,675
CLO	**-**	**2,273**	**-**	**2,273**
Residential Mortgages	-	2,273	-	2,273
CMBS	**766**	**315**	**1,649**	**2,730**
Non-residential Mortgages	766	315	1,649	2,730
RMBS	**-**	**-**	**23,812**	**23,812**
Residential Mortgages	-	-	23,812	23,812
Total as at 31/12/2014	**766**	**2,588**	**25,461**	**49,490**
Total as at 31/12/2013	**1,614**	**3,414**	**63,218**	**68,245**

Tab. 11.2.7 – Total securitised exposures by Banking/Trading and related capital requirements (standard approach)

Type	Exposures	Capital Requirements
Banking Book	54,088	13,093
Regulatory Trading Book	49,490	4,636
Total as at 31/12/2014	**103,578**	**17,729**
Total as at 31/12/2013	**1,291,291**	**172,728**

Tab. 11.2.8 – Securitised exposures by risk weight bands – Banking Book

Type	Risk weight band							Total
	20%	50%	100%	225%	350%	650% 1250%	1250% No Rating	
Own Securitisations	-	-	-	-	-	-	4.094	4.094
Third-parties Securitisations	-	-	-	-	-	-	-	-
Re-securitisation	-	-	-	49.994	-	-	-	49.994
Totale as at 31/12/2014	**-**	**-**	**-**	**49.994**	**-**	**-**	**4.094**	**54.088**
Totale as at 31/12/2013	**39.539**	**447.320**	**86.026**	**165.447**	**-**	**54.807**	**23.079**	**816.218**

The table above details the securitised exposures by risk weight bands and type of transactions. The amounts shown, in line with prudential regulations, relate to own and third-party securitised exposures included in the banking book. Therefore, they do not include the securitised exposures included in the regulatory trading book, detailed in the following tab. 11.2.10. Moreover, as far as own securitisations are concerned, in compliance with supervisory regulations, the table does not include securitised exposures:

a) that refer to transactions that are not recognised as securitisations for prudential supervisory purposes, since, among other reasons, they do not entail the actual transfer of credit risk;

b) whose overall risk-weighted value to the same securitisation exceeds the risk-weighted value of underlying securitised assets, calculated as if they had not been securitised (cap test).

Both in the case of a) and b), capital requirements are calculated in relation to securitised assets and not to the corresponding exposures securitised. Moreover, in this case, securitized assets are classified in their original regulatory classes (exposures secured by real estate, etc.) and are therefore excluded from "Securitisations".

Tab. 11.2.9 – Capital requirements of securitised exposures by risk weight bands – Banking Book

Type	Risk weight band 20%	50%	100%	225%	350%	650% 1250%	1250% No Rating	Total
Own Securitisations	-	-	-	-	-	-	4,094	4,094
Third-parties Securitisations	-	-	-	-	-	-	-	-
Re-securitisation	-	-	-	8,999	-	-	-	8,999
Totale as at 31/12/2014	**-**	**-**	**-**	**8,999**	**-**	**-**	**4,094**	**13,093**
Totale as at 31/12/2013	**633**	**17,893**	**6,882**	**29,780**	**-**	**54,807**	**23,079**	**133,074**

Tab. 11.2.10 – Securitised exposures by risk weight bands – Trading Book

Type	Risk weight band 20%	50%	100%	225%	350%	650% 1250%	1250% No Rating	Total
Own Securitisations	-	-	-	-	-	-	-	-
Third-parties Securitisations	23,459	22,677	-	-	-	3,354	-	49,490
Re-securitisation	-	-	-	-	-	-	-	-
Totale as at 31/12/2014	**23,459**	**22,677**	**-**	**-**	**-**	**3,354**	**-**	**49,490**
Totale as at 31/12/2013	**2,365**	**17,762**	**452,217**	**-**	**-**	**2,729**	**-**	**475,073**

The table above details the exposures securitised by risk weight bands and by type of transactions.
The amounts shown relate to own and third-party securitised exposures included in the regulatory trading book.

Tab. 11.2.11 – Capital requirements of securitised exposures by risk weight bands – Trading Book

Type	Risk weight band 20%	50%	100%	225%	350%	650% 1250%	1250% No Rating	Total
Own Securitisations	-	-	-	-	-	-	-	-
Third-parties Securitisations	375	907	-	-	-	3,354	-	4,636
Re-securitisation	-	-	-	-	-	-	-	-
Totale as at 31/12/2014	**375**	**907**	**-**	**-**	**-**	**3,354**	**-**	**4,636**
Totale as at 31/12/2013	**38**	**710**	**36,177**	**-**	**-**	**2,729**	**-**	**39,654**

12. Operational Risk

12.1 Operational Risk: general disclosure

The Montepaschi Group has implemented an integrated risk management system on the basis of a governance model which involves all the companies of the Montepaschi Group included in the scope of application. The approach defines the standards, methods and instruments that make it possible to measure risk exposure and the effects of mitigation by business area.

The Montepaschi Group was authorized by the Bank of Italy on 12 June 2008 to use the internal advanced measurement approach (AMA) for the calculation of capital requirements for operational risks. The advanced model officially started operating on 1 January 2008. The first consolidated regulatory reporting on the basis of the model was prepared in relation to the results as at 30 June 2008.

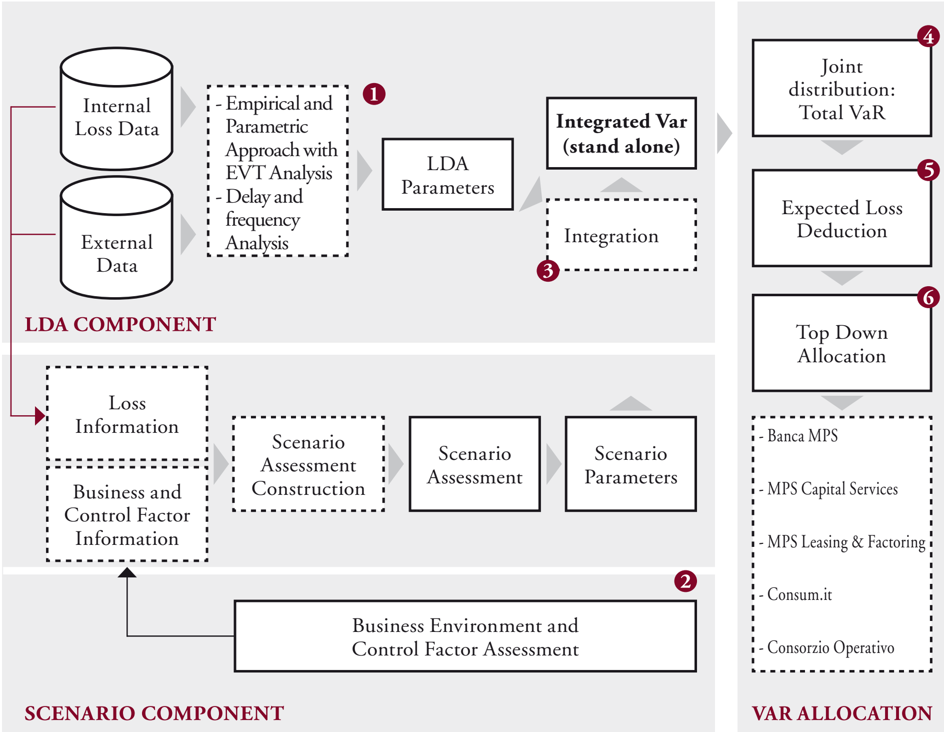
All the domestic banking and financial components are incorporated in the scope of advanced measurement approach (AMA).

For remaining components and foreign companies, the foundation model has been adopted.

Today's internal model coverage in terms of total banking income exceeds 95%. The advanced approach adopted by the Montepaschi Group is designed so as to homogeneously combine all the main qualitative and quantitative information (or data) sources (mixed LDA-Scenario model).

The quantitative loss Distribution Approach component is based on the statistical collection, analysis and modelling of internal and external historical loss data (Italian Database of Operational Losses, DIPO). The model includes calculation in relation to the 7 categories of events established by Basel 2 used as risk classes, with the adoption of Extreme Value Theory techniques. The estimated frequency of occurrence is based exclusively on internal data.

The qualitative component focuses on the evaluation of the risk profile of each unit and is based on the identification of relevant scenarios. In this framework, the companies are involved in process and risk identification, risk evaluation by process managers, identification of possible mitigation plans, discussion (in scenario-sharing sessions) of priorities and technical-economic feasibility of mitigation actions with the H.O. units.



Finally, the percentage breakdown of events and operational losses recorded in 2014 is reported, divided into the following risk classes:

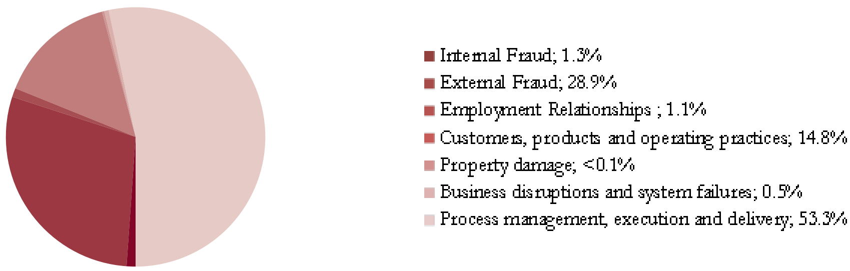
- Internal fraud: losses arising from unauthorised activities, fraud, embezzlement or violation of laws, regulations or corporate directives that involve at least one internal resource of the Group;
- External fraud: losses due to fraud, embezzlement or violation of laws by subjects external to the Group;
- Employment relationships and Occupational safety: losses arising from actions in breach of employment, occupational health and safety laws and agreements, payment of compensation for personal injury or episodes of discrimination or failure to apply equal treatment;
- Customers, products and operating practices: losses arising from non-fulfilment of professional obligations with customers or from the nature and characteristics of the product or service provided;
- Property damage: losses arising from external events, including natural disasters, acts of terrorism or vandalism;
- Business disruptions and system failures: losses due to business disruption or system failures or interruption;
- Process management, execution and delivery: losses arising from operational and process management shortfalls, as well from transactions with business counterparties, vendors and suppliers.

Overall loss as at 31 December 2014 remains substantially stable compared to 2013 The types of event with the greatest impact on the income statement remain attributable to non-fulfilment of professional obligations with customers" (under "Customers, products and operating practices": 53.1% of total) and operational and process management shortfalls (under "Process management, execution and delivery", which accounts for 22.7% of total).

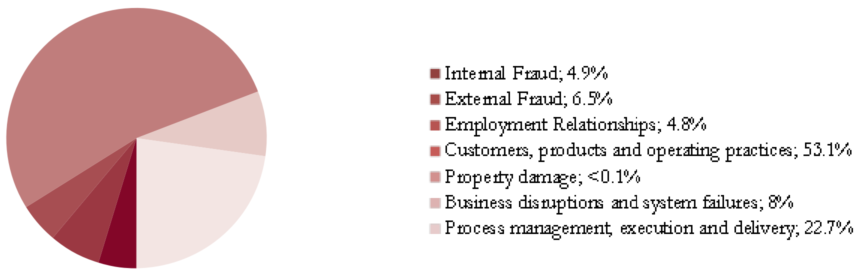
With regard to "non-fulfilment of professional obligations with customers", risk events are mainly associated with claims (legal actions and complaints) due to the application of compound interest.

For further information, please refer to the **Notes to the Consoldiated Financial Statements** - *Part E – Information on risks and hedging policies – Section 4 – Operating Risks.*

Events breakdown
Montepaschi Group - 31/12/2014



Losses breakdown
Montepaschi Group - 31/12/2014



12.2 Operational Risk: use of advanced measurement methods

Tab. 12 – Capital requirements for Operational Risk

Requirements by Approach	dec-14
Foundation Approach	20,212
Standardised Approach	
Adavanced Measurement Approach	688,055
Total Operational Risk	**708,267**

13. Remuneration policy

For information regarding the Montepaschi Group's remuneration policy, please refer to the Remuneration Report prepared pursuant to art. 123-ter of the Consolidated Finance Act and published on the corporate website at: https://english.mps.it/Investor+Relations/Corporate+Governance/PoliticheRemunerazione/default.htm.

Statement of the Chief Executive Officer pursuant to art. 435, e) and f) of Regulation (EU) no. 575/2013 of 26-06-2013

By mandate of the Board of Directors of Banca Monte dei Paschi di Siena S.p.A and pursuant to art. 435, e) and f) of Regulation (EU) no. 575/2013 of 26-06-2013, the Chief Executive Officer, Fabrizio Viola, declares that:

a) The risk management systems put in place by the Parent Company and described in the d document "Pillar 3 Disclosure: update as at 31 December 2014" are in line with the Banking institution's profile and strategy;

b) The section, "Executive Summary", of the same document provides a summary description of the Montepaschi Group's overall risk profile in relation to the company strategy adopted.

Siena, 04 March 2015

Fabrizio Viola

Chief Executive Officer

Declaration of the Financial Reporting Officer

Pursuant to para. 2, article 154-bis of the Consolidated Law on Banking, the Financial Reporting Officer, Mr. Arturo Betunio, declares that the accounting information contained in this document corresponds to the underlying documentary evidence and accounting records.

Siena, 04 March 2015

Arturo Betunio
Financial Reporting Officer

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Glossary

ABS (Asset Backed Securities): Financial Securities whose coupon yield and redemption are guaranteed by a pool of assets (collateral) of the issuer (usually a Special Purpose Vehicle), exclusively intended to ensure satisfaction of the rights attached to said financial securities. Typically, thy are broken down into RMBS and CMBS.

AFS (Available For Sale): IAS category used to classify the assets available for sale.

AIRB (Advanced Internal Rating Based): advanced internal models used to calculate capital requirements for credit and counterparty risk within the Basel 2 and Basel 3international framework. They differ from the FIRB models since with the AIRB approach, the banks uses its own internal estimates for all inputs. See also PD, LGD, EAD.

ALM (Asset & Liability Management): the set of risk management models and techniques applied to the Banking Book for the purpose of measuring interest rate risk and liquidity risk.
See also Banking Book, Interest Rate Sensitivity, Shift Sensitivity, Economic Value Approach.

AMA (Advanced Measurement Appro-ach): advanced internal models used to calculate capital requirements for operational risk within the Basel 2 and Basel 3 international framework. The approach involves the measurement of capital requirements by the bank through calculation models based on operational loss data and other valuation elements the bank collects and processes.

AT1 (Additional Tier 1): Additional Tier 1 Capital consists of equity instruments other than ordinary shares (calculated in CET1) that meet the conditions for inclusion in Tier 1 capital net of deductions of class 1 items. The latter mainly relate to instruments held in financial entities with significant investments and not to cross-shareholdings.

Banking Book: in accordance with International best practices, the term “banking book” refers to all of the non-trading operations of the Bank in relation to the transformation of maturities with respect to balance-sheet assets and liabilities, Treasury, foreign branches and hedging derivatives. The interest rate, liquidity and forex risk of the Banking Book are typically measured trough Asset & Liability Management (ALM) models. See Regulatory Banking Book.

Basel 1: the regulations relating to the application of Minimum Capital Requirements issued by the Basel Committee in 1988.

Basel 2: the regulations relating to the application of the New Capital Accord issued by the Basel Committee in 2006.

Basel 3: a regulatory framework that has been introduced by the Basel Committee as of 2010 to strengthen regulations concerning capital and liquidity and thereby increase the resilience of the banking sector. The reforms are aimed at increasing the banking system’s capacity to absorb shocks arising from financial and economic stress, whatever their origin, and reduce the risk of contagion from the financial sector to the real economy. Regulated within the Community by the “CRR”, Regulation (EU) No 575/2013 and “CRD IV”, Directive 2013/36/EU.

BCU: Business Control Unit. Local, first-level risk management functions, located within the areas / business units (BUs).

BP (basis point): one hundredth of a percentage point, ie. 1bp = 0.01% = 0.0001.

BU: Business Unit.

Capital Requirements: the sum of capital, calculated according to supervisory regulations, destined to cover the single risks of the First Pillar in compliance with the supervisory framework.

CCF: Credit Conversion Factor.

CDS (Credit Default Swap): An agreement whereby, upon payment of a premium, one party transfers to another party the credit risk attached to a loan or security, in the event of a loan default by the debtor.

CDO (Collateralized Debt Obligation): Securities issued based on differentiated risk classes with various tranches following the securitisation of a portfolio of debt instruments embedding a credit risk. Typically characterised by financial leverage.

ABS CDO: CDOs whose underlying asset portfolio primarily consists of Asset-Backed Securities.

Corporate customers: customer segment consisting of medium- and large-sized companies (mid corporate, large corporate).

Retail customers: customer segment primarily consisting of consumers, professionals, shop-keepers and artisans.

CMBS: Commercial Mortgage Backed Securities.

Prudential Ratios: Regulatory ratios which relate different types of capital to risk-weighted assets (RWAs). *See also* CET1 capital ratio, Tier 1 Capital Ratio, Total Capital Ratio.

Common Equity Tier 1 (CET1) Capital Ratio: **t**he ratio between CET1 and total RWA.

Confidence level: level of probability linked to a risk measurements (e.g. VaR).

Counterparty Risk: Counterparty risk is the risk that the counterparty in a specific financial transaction is in default prior to settlement. Counterparty Risk is associated with certain, specifically-identified types of transactions, which: 1) generate an exposure that is equal to their positive fair value; 2) have a market value which evolves over time depending on underlying market variables; 3) generate an exchange of payments or an exchange of financial instruments or goods against payment. The categories of transactions subject to counterparty risk are:
credit and financial derivative instruments traded Over the Counter (OTC);
Securities Financing Transactions (SFT);
Long Settlement Transactions (LST).

Covered bond: Special bank bond that, in addition to the guarantee of the issuing bank, is also backed by a portfolio of mortgage loans or ther high-quality loans sold to a special purpose vehicle.

CRD IV (Capital Requirements Directive IV): Directive 2013/36/EU of the European Parliament and of the Council of the 26 June 2013, on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms, amending Directive 2002/87/EC and repealing Directives 2006/48/EC and 2006/49/EC.

CRR (Capital Requirements Regulation): Regulation (EU) No 575/2013 of the European Parliament and of the Council of the 26 June 2013, on prudential requirements for credit institutions and investment firms and amending Regulation (EU) No 648/2012.

Credit derivatives: Derivative contracts for the transfer of credit risks. These products allow investors to perform arbitrage and/or hedging on the credit market, , to acquire credit exposures of varying maturities and intensities, to modify the risk profile of a portfolio and to separate credit risks from other market risks.

Credit Risk: the risk that a debtor may default on his obligations, either at maturity or subsequently. Credit Risk is associated with an unexpected change in creditworthiness of a responsable party – towards whom there is an exposure – which generates a corresponding unexpected change in the value of the credit position.

CRM (Credit Risk Mitigation): set of credit risk mitigation techniques recognised for supervisory purposes (e.g., compensation of accounts in balance sheet, personal guarantees, credit derivatives, financial collaterals), for which the following eligibility requirements apply - legal, economic and organisational - for the purpose of reducing risk.

Cure Rate: the rate with which impaired loan positions return to performing status.

Default, credit exposures: these include nonperforming loans, watchlist loans, restructured loans and past-due.

Default status: state of insolvency or delinquency of a debtor. Declared inability to honour one's debt and/or make the relevant interest payments.

Deferred Tax Assets (DTA): the amounts of income taxes payable in future periods in respect of taxable temporary differences between the carrying amount of an asset or liability and its tax base.

Deferred Tax Assets (DTA) that rely on future profitability: deferred tax assets, the future value of which may be realised in the event the institution generates taxable profit in the future. They are divided between DTAs arising from temporary differences and DTAs not arising from temporary differences (eg. Tax losses).

Delta EL: *see* Surplus of expected loss value over the value of net provisions.

DIPO: Database Italiano Perdite Operative. The Italian Database of Operational Losses. Database used for operational risk.

Diversification: benefit arising from the simultaneous holding of financial instruments which depend upon risk factors not perfectly matched. In the case of VaR, this corresponds to the correlation
effect among risk factors on the overall VaR value.

EAD: *see* Exposure-at-Default.

ECA: Export Credit Agency.

ECAI (External Credit Assessment Institution): External Credit Assessment Institution (Rating Agencies).

Economic Capital: the capital needed to deal with any loss in value generated by unexpected changes in conditions, internal or external, as a consequence of risk. It is calculated on the basis of risk measurement models developed by the Risk Management area. In general, it is obtained on the basis of a consistent transformation in terms of holding period and confidence interval of VaR measurements calculated for individual risk factors and appropriately diversified. The confidence interval is a function of the bank's objective rating. The Economic Capital is the internal estimation of capital needed to deal with risk that is the necessary operational equivalent of Capital Requirements (Regulatory Capital).

Economic Value approach: measure of the changes in the Banking Book overall net current value (defined as the difference between the current value of assets, the current value of liabilities and the value of hedging derivatives) in the presence of different alternative interest rate scenarios. The focus is placed on the changes in the net current economic value of the Bank and takes account of all maturities of assets, liabilities and off-balance-sheet items existing at the time of each valuation. It is typically measured with shift sensitivity assumptions. See also AL M, Banking Book, Interest Rate Sensitivity, Shift Sensitivity.

Expected Loss (EL): the total amount of net losses which, on average, the bank can expect (estimate) to incur in the 12 month period following the date of reference on the total amount of performing loans in the portfolio upon measurement. Estimated ex-ante as the "cost of doing business", it ought to be directly included, in terms of spread, in the pricing conditions applied to the customer and covered using an appropriate accounting provision policy. It is defined as the product of the probability of default (PD) and loss given default (LGD):

EL = PD x LGD

The Expected Loss amount is defined as the product between EL and Exposure at Default (EAD):

EL amount = EL x EAD

Exposure at Default (EAD): estimated future value of an exposure upon default of a client. EAD, for the purposes of calculating capital requirements, includes both the cash exposure and the expected usage of the endorsment exposure. Value required in the advanced model for credit risk measurement (AIRB - "Advanced Internal Rating Base Approach") as set out by Basel framework.

Fair Value (FV): the amount at which an asset could be bought or sold or a liability incurred or settled, in an arm's length transaction between willing, independent parties.

FIRB (Foundation Internal Rating Based): the internal models used to calculate capital requirements for credit and counterparty risk within the international Basel 2 Accord. It differs from the AIR B approaches because, in this case, only the PD parameters are estimated by the bank.

Grandfathering: Provision to safeguard capital adequacy, whereby an old rule continues to apply to some existing situations while a new rule will apply to all future situations.

HFT (Held For Trading): IAS category used to classify trading assets and liabilities.

Holding period (hp): forward-looking length of time for which a position is held.

IAS/IFRS: the International Accounting Standards are issued by the International Accounting Standards Board (IASB). The standards issued after July 2002 are called IFRS (International Financial Reporting Standards).

ICAAP (Internal Capital Adequacy Assessment Process): it is the "Second Pillar" of Basel framework. Banks are required to adopt processes and instruments for determining the level of internal capital needed to cover any type of risk, including risks different from those covered by the total capital requirement ("First Pillar"), when assessing current and future exposure, taking into account business strategies and developments in the economic and business environment.

ILAAP (Internal Liquidity Adequacy Assessment Process): is the internal process for assessing the overall liquidity profile of an institution. The equivalent ICAAP for liquidity risk within SREP.

IMA (Internal Models Approach): method of VaR internal models for the calculation of capital requirements for market risk.

Impairment: when referred to a financial asset, a situation of impairment is identified when the book value of an asset exceeds its estimated recoverable amount.

Risk Adjusted Indicators: see Risk Adjusted Performance Measurement.

Interest Rate Sensitivity (Economic Value approach): measurement of the impact an unexpected shift (parallel or not) in the yield curves by maturity generates on the bank's economic value. It is typically used to measure the interest rate risk of the Banking Book within the Asset & Liability Management (ALM) systems. The value is obtained from calculating the variation in the current value of the real and notional cash flows of sheet assets, liabilities and off-balance items existing at a certain date when there is a variation in the yield curve (eg. +25 bp) with respect to the values of the baseline.

Investment grade: issuers or issues with a rating between AAA and BBB-.

Issuer Risk: connected to the issuer's official rating, this is the risk of decreasing portfolio value due to the unfavourable change in the issuer's credit standing up to the extreme case of default, in the buying and selling of plain vanilla or credit structured bonds, ie. purchase/selling of protection through credit derivatives.

Junior tranche: in a securitisation transaction it is the lowest-ranking tranche of the securities issued (Equity tranche), being the fi rst to bear losses that may occur in the course of the recovery of the underlying assets.

LCR (Liquidity Coverage Ratio): Liquidity regulatory ratio. It aims to strengthen the short-term resilience of the liquidity profile of the bank. The calculation of the LCR is being defined by the EBA.

LDA (Loss Distribution Approach): model used to assess exposure to operational risk. It makes it possible to estimate the amount of expected and unexpected loss for any event/loss combination and any business line.

Leverage Ratio: indicator given by the ratio between Tier 1 and total assets introduced by Basel regulations with the objective to limit the growth of leverage in the banking sector and strengthen the risk-based requirements using a different measure based on balance sheet aggregates.

LGD (Loss-Given-Default): Tasso di perdita in caso di insolvenza (default) determinato come il rapporto tra la perdita subita su un'esposizione a causa del default di una controparte e l'importo residuo al momento del default. LGD is estimated in the form of a coefficient ranging from 0 to 1 (oppure in termini percentuali) based on the following drivers: type of borrower, type of guarantee pledged, technical form of lending. This value is required within the framework of the Advanced Internal Ratings-Based Approach (AIRB) for credit risk under Basel framework. When conditioned on adverse macro-economic scenarios (or downturns), the LGD parameter is defined as "downturn LGD".

Liquidity Risk: the risk that a company will be unable to meet its payment obligations due to its inability to liquidate assets or obtain adequate funding from the market (funding liquidity risk) or due to the difficulty/impossibility of rapidly converting financial assets into cash without negatively and significantly affecting their price due to inadequate market depth or temporary market disruptions (market liquidity risk).

L&R (Loans & Receivables): IAS category used to classify credit.

LST (Long Settlement Transactions): long settlement transactions (in which a counterparty commits to delivering (receiving) a security, commodity or foreign currency against receipt (delivery) of cash payment, other financial instruments or goods with settlement upon a pre-established contractual date, later than the one determined by market practice for these types of transaction, namely five days from the transaction stipulation date.

M (Maturity): the residual life of an exposure, calculated according to prudential requirements for credit risk. For banks authorised to use internal ratings, it is explicitly considered if the advanced approach is adopted, while it is predetermined by legislation if the FIR B approach is adopted.

Margin Sensitivity: measurement of the impact which an unexpected shift (parallel or not) in the yield curve by maturity generates on the Bank's estimated one year net interest income. It is typically used to measure interest rate risk in the banking book within Asset & Liability Management (ALM) systems along with Interest Rate Sensitivity.

Mark-to-market: valuation of a position at market value, usually from the trading book. For instruments officially traded on organised markets, it corresponds daily to the market closure price. For unlisted instruments, it results from the development and the application of specifically- developed pricing functions which determine the valuation starting from the market parameters relating to the respective risk factors.

It is at the basis of the calculation of P&L in the trading book.

Mark-to-model: Valuation of financial instruments on the basis of internal valuation models since publicly observable market prices or comparable approaches are not available.

Market Risk: the risk of value loss on a financial instrument or a portfolio of financial instruments, resulting from an unfavourable and unexpected change in market risk factors (interest rates, share prices, exchange rates, price of goods, indices,…). A typical risk of the trading book.

Market Value Method (former Current Value method): supervisory method used to determine counterparty risk in derivatives and the capital requirement to cover it. The current value is calculated adding the replacement cost (or intrinsic value, determined on the basis of the "mark-to-market" value of the derivative, if positive) to the future credit exposure (approximating the time value of then derivative, i.e. the probability that, in the future, the intrinsic value will increase, if positive, or convert into a credit exposure if negative); the future credit exposure is determined for all contracts, independently of the positive value of the replacement cost, multiplying the nominal value of each derivative contract by coefficients differentiated by residual maturity and type of contract.

Mezzanine tranche: in a securitisation transaction, it is the tranche ranking between junior and senior tranche. As a rule, the mezzanine tranche is broken down into 2 or more tranches with different levels of risk, subordinated one to the other. They are typically characterised by an investment grade rating.

NFIs: New Financial Instruments, issued pursuant to art. 23-sexies of Legislative Decree no. 95 of 6 July 2012, containing "Urgent measures for reviewing public spending with unchanged services for citizens and measures to strengthen the capital of undertakings in the banking sector" converted, as amended, by law no. 135 of 7 August 2012, n.135 as subsequently amended.

NSFR (Net Stable Funding Ratio): Liquidity regulatory ratio. It is defined as the ratio between the available amount of stable funding and the required amount of stable funding. The time horizon considered for evaluating stable funding is one year. The calculation of the NSFR is being defined by the EBA.

Non performing: term generally referring to loans for which payments are overdue.

Operational Risk: the risk of incurring losses due to inadequacy or failure of processes, human resources or internal systems, or as a result of external events, including legal risk. These include, among other , loss deriving from fraud, human error, business disruption, system failure, breach of contract, natural disasters. Operational Risk includes legal risk while it does not include strategic or reputational risk (included in Pillar II of Basel).

Overall Capital Requirement (or Regulatory Capital): the sum of the capital requirements for the individual risk types (Credit, Counterparty, Market and Operational).

OTC: *see* OTC derivatives.

OTC Derivatives (Over the Counter): financial and credit derivatives traded over the counter (e.g.: swaps, forward rate agreements).

Own Funds: sum of Tier 1 (T1) and Tier 2 (T2) Capital.

Past due: *see* Default.

PD: *see* Probability of Default.

Performing: term generally referring to loans characterised by regular performance.

Regulatory Banking Book: comprises all positions that are not assigned to the Regulatory Trading Book; its definition is therefore 'residual' in nature, even though most of a retail bank's exposures are assigned to this portfolio; in general, the rules for determining the capital requirements for Credit Risk are applied to the Regulatory Banking Book. See also Banking Book.

Regulatory Trading Book: positions intentionally held for trading purposes and destined to be disposed of in the short term and/or assumed with the aim of benefitting, in the short term, from the differences between purchase and sale price, or other price or interest rate variations. It consists in a set of positions in financial instruments and commodities held for trading or to cover risk inherent in other constituent of the same portfolio. For eligibility to be included under the trading book prudential treatment, the financial instruments must be exempt from any clause which would limit their trade ability or, in alternative, fully covered. Furthermore, the positions must be frequently and accurately assessed. The trading book must be actively managed.

Private equity: activity aimed at the acquisition of equity investments and their subsequent sale to specific counterparties, without public offerings.

Preference shares: are innovative capital instruments that enjoy preferential rights in relation both to dividends (which may be cumulative or non-cumulative) and rights clearance and whose administrative rights are, as a rule, limited or subject to certain conditions of use.

Probability of Default (PD): the probability that a customer/counterparty will default within the space of 1 year. Each PD derives from an internal ratings system and thus falls within a specific range of values corresponding to those used by the official rating agencies (masterscale) so as to obtain standardised data processing between internal and external rating systems.

Profit & Loss (P&L): operational profit or loss indicator of the Trading book which expresses the difference in value of an instrument or a portfolio in a given timeframe, calculated on the basis of market values and directly validated/listed ("mark-to-market") or determined on the basis of internally-adopted pricing models ("mark-to-model").

RAPM: cfr. Risk Adjusted Performance Measurement.

Rating: the degree of risk of non-compliance regarding a specific debtor (counterparty or issuer rating) or a single loan (issuance rating). It is typically expressed through a qualitative assessment belonging to a calibration scale. If determined by a rating agency it becomes an "official" rating. If it is based upon internally-developed models it is called an "internal" rating. It expresses the likelihood of default or insolvency.

Risk: can be defined as an unexpected potential economic loss. Risk is an economic loss in the sense that, against the commercial initiatives undertaken, if risk emerges it always results in a loss of value in the books of the Bank. Risk is an unexpected loss and implies the need to set aside a corresponding sum of capital in order to guarantee the bank's stability and solvency over a long period. Risk is a potential loss in the sense that there may or may not be a certain confidence level (probability) in the future (forward looking) estimate and it is therefore an estimate, not a known value. Since risk is potential, it is always prospective or forward-looking. It is not the measurement of an economic effect that has already materialised.

Risk Adjusted Performance Measurement (RAPM): measurement of performance adjusted by risk. Method of measurement of profitability, which is defined as "risk adjusted" in that – on the one hand - it includes a new P&L negative component under Profit for the Year, that rises as the expected risk component increases (Expected Loss), and - on the other - replaces the "book value" capital used in the transaction with the Economic Capital.

Risk factor: the driver/variable which determines the variation in value of a financial instrument.

RMBS (Residential Mortgage Backed Securities): ABS backed by mortgages.

RWA (Risk Weighted Assets): it results from the application of certain risk weights to exposures as determined by supervisory regulations.

Securitisation Cap Test: the test undergone by all securitisation transactions recognised for prudential purposes, according to which the risk-RWAs of securitisation positions are compared with those of securitized exposures (calculated as though the latter were not securitised). If the RWAs of the former are greater than those of the latter (cap) then the latter are taken into consideration.

Scoring: a company's customer analysis system which consists in an indicator resulting from both an analysis of book data and an assessment of the performance forecast for the sector, on the basis of statistic-based methodologies.

Senior/Super Senior tranche: it represents the tranche with the highest credit enhancement, or rather the highest level of privilege in terms of priority of remuneration and reimbursement. It has a high rating and is higher than the mezzanine tranche.

Seniority: Level of subordination regarding the repayment of notes, generally broken down (in decreasing order) into SuperSenior, Senior, Mezzanine, Junior.

Servicer: in securitisation transactions it is the subject that - on the basis of a specific servicing contract - continues to manage the securitized loans or assets after they have been transferred to the special purpose vehicle responsible for issuing the securities.

Settlement Risk: the risk that arises in transactions on securities when, after expiry of a contract, the counterparty is in default with regard to delivery of securities or payment of amounts due.

SFT (Security Financing Transactions): repos and reverse repos on securities or commodities, securities or commodities lending or borrowing transactions and margin lending transactions.

Shift Sensitivity: measurement of the impact of an unexpected and parallel shift in the yield curve upon the bank's economic value. See ALM, Banking Book, Interest Rate Sensitivity, Economic Value Approach.

SMEs: Small and Medium Enterprises.

Speculative grade: issuers or issues with a rating below BBB-.

SPE/SPV (Special Purpose Entities o Special Purpose Vehicles): established in pursuit of specific objectives, mainly to isolate financial risk. The assets consist in a portfolio, the proceeds of which are used for the servicing of bond loans issued. Typically used in asset securitisation transactions.

SREP (Supervisory Review and Evaluation Process): a supervisory revi ew and evaluation process put in place by the Regulatory Authority. It is composed of three main elements:
- a Risk Assessment System (RAS), which assesses the level of risk and control activities of credit institutions;
- a comprehensive review of the ICAAP and ILAAP processes;
- a methodology for quantifying capital and liquidity on the basis of risk assessment results.

Stress test: a set of quantitative an d qualitative techniques used by banks to assess their vulnerability to exceptional, though plausible, events.

Surplus Expected Losses on Net Provisions ("Delta PA"): the difference between expected losses and overall net value adjustments, limited to the exposures subject to internal models for credit risk; it is a component of the Own Funds.

Consolidated Banking Act (CBA): Legislative Decree no. 385 of 1 September 1993 and subsequent amendments and additions.

T1 (Tier 1): Tier 1 capital. It is the sum of CET1 and AT1.

T2 (Tier 2): Tier 2 capital. It is mainly composed of computable subordinated liabilities computable and any excess value adjustments with respect to expected losses for exposures weighted according to the AIRB approach.

Tier 1 Capital Ratio: ratio between T1 and total RWAs.

Tier Total (see Own Funds, former Regulatory Capital): sum of Tier 1 (T1) and Tier 2 (T2) capital.

Total Capital Ratio: ratio between Tier Total (Own Funds) and total RWAs.

TTC (Through-the-cycle): a rating system which uses a long-term time series and better reflects the risks relating to a borrower's specific situation. The impact of macroeconomic trends on this kind of model are limited. A "Point-in-time" rating system uses a short-term or one year time series and not only reflects information regarding the individual borrower. It produces ratings that change on the basis of systemic factors. Most internal rating models estimated by banks do not perfectly correspond to one rating system or the other but fall somewhere between the two models. They are defined as "Hybrid".

UCITS: Undertakings for Collective Investments in Transferable Securities.

Value-at-Risk (VaR): probability measure of a portfolio's market risk. It is defined as the maximum potential loss in value of an asset or portfolio over a defined period *(holding period)* for a given *confidence interval* (with the *confidence level* expressing probability). As an example, with regard to the trading book, the VaR model estimates the maximum decrease (loss) that a portfolio is expected to incur with a specified probability (for ex. 99%), over a defined time horizon (for ex. 1 day). In this example, a 1 day VaR with a 99% confidence implies that there is only a 1% chance of the Bank losing more than the VaR amount in one single working day.

Volatility: measure of the exposure to fluctuations of a risk factor (e.g. rates, prices, foreign exchange,…) over a set period of time.

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