

Disclosure Report June 2023 according to FINMA Circular 16/1 "Disclosure - Banks"

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Introduction

Vontobel is subject to the full disclosure requirements for capital adequacy according to the conditions defined in the circular 2016/1 "Disclosure - Banks" (latest update as of 8th December 2021) of the Swiss Financial Market Supervisory Authority (FINMA).

The group publishes the quantitative information according to the circular 2016/1 in a separate report in addition to the Annual Report. Most of the required qualitative information is disclosed in the Annual Report 2022 (AR 2022) of Vontobel under "Risk management and risk control" and "Capital" (AR 2022, page 141ff.). This specifically includes the description of the strategy, processes and organisation employed for managing credit risks, counterparty risks, market risks in the trading book and banking book as well as operational risks.

In section "3. Market risk" (AR 2022, page 142ff.), the methods and processes employed for measuring and limiting market risks are explained. For the trading book, Vontobel calculates regulatory capital requirements based on the standard approach for market risks.

The assumptions applied for determining interest rate risk are described in section "3.3 Market risks related to the balance sheet structure" (AR 2022, page 144ff.). This section also contains an explanation of the methods used in practice to hedge or reduce the risks related to changes in interest rates.

Section "4. Liquidity risk and refinancing" (AR 2022, page 147f.) describes the strategies and guidelines to manage liquidity risk under stressed conditions within the defined liquidity risk tolerance.

In section "5. Credit, counterparty and issuer risk" (AR 2022, page 149ff.), the risk practice and the practice in relation to collateral are explained. External ratings from Standard & Poor's, Moody's, Fitch and Fedafin are employed for determining the risk weighting of amounts due from banks and of the debt instruments in the banking book. The Standardised Approach (SA-BIS) is applied for calculating capital requirements for credit risks. As part of the reduction of credit risks (risk mitigation), the comprehensive approach with standard haircuts defined by the supervisory authorities is applied for the recognition of collateral.

The basic indicator approach is used for calculating the capital adequacy for operational risks. Management and control of the operational risks are described in section "6. Operational risks" (AR 2022, page 152f.).

The section "Capital" (AR 2022, page 155ff.) describes the capital management principles, the legal parameters and the consolidation scope used for calculating the required capital as well as the approaches applied by Vontobel.

The "Compensation Report" has already been published as an integral part of the Annual Report 2022 (page 57ff.).

The reference of each disclosure table corresponds to the references in annex 1 and 2 of the FINMA Circular 16/1, which also correspond to the references made in BCBS "Revised Pillar 3 disclosure requirements" (published in January 2015).

In accordance with margin no. 14.2 of the revised circular 2016/1, the following tables, due for the half-year publication of a category 3 bank, are not included due to their lack of relevance or applicability: CR6, CR7, CR8, CR10, CCR4, CCR7, MR2, MR3, MR4.

KM1: Basic regulatory key figures

(in 1'000 CHF)		a	b	c	d	e
		2023-06-30	2023-03-31	2022-12-31	2022-09-30	2022-06-30
Available capital (amounts)						
1	Common Equity Tier 1 (CET1)	1'155'455		1'052'691		1'186'536
1a	Common Equity Tier 1 capital without the effects of the transitional provisions for expected losses					
2	Tier 1 Capital (T1)	1'605'290		1'502'279		1'635'876
2a	Tier 1 capital without the effects of the transitional provisions for expected losses					
3	Total capital	1'605'290		1'502'279		1'635'876
3a	Total capital without the effects of the transitional provisions for expected losses					
Risk-weighted assets (RWA) (CHF)						
4	Total risk-weighted assets (RWA) (CHF)	6'691'118		6'304'060		6'414'472
4a	Minimum capital (CHF)	535'289		504'325		513'158
Risk-based capital ratios (in % of RWA)						
5	CET1 ratio (%)	17.3%		16.7%		18.5%
5a	CET1 ratio without the effects of the transitional provisions for expected losses (%)					
6	Tier 1 capital ratio (%)	24.0%		23.8%		25.5%
6a	Tier 1 capital ratio without the effects of the transitional provisions for expected losses (%)					
7	Total capital ratio (%)	24.0%		23.8%		25.5%
7a	Total capital ratio without the effects of the transitional provisions for expected losses (%)					
Additional CET1 buffer requirements (in % of RWA)						
8	Capital buffer in accordance with Basel Minimum Standards (%)	2.5%		2.5%		2.5%
9	Countercyclical buffer (Article 44a CAO) in accordance with Basel Minimum Standards (%)	0.0%		0.0%		0.0%
10	Additional capital buffer due to national or international systemic importance (%)	0.0%		0.0%		0.0%
11	Overall buffer requirements in accordance with Basel Minimum Standards in CET1 quality (%)	2.5%		2.5%		2.5%
12	Available CET1 to cover buffer requirements in accordance with Basel Minimum Standards (after deducting CET1 from the cover of the minimum requirements and possibly to cover the TLAC requirements) (%)	12.8%		12.2%		14.0%
Target capital ratios according to Annex 8 CAO (in % of RWA)						
12a	Capital buffer according to Annex 8 CAO (%)	4.0%		4.0%		4.0%
12b	Countercyclical buffer (Articles 44 and 44a CAO) (%)	0.2%		0.2%		0.0%
12c	CET1 target ratio (in %) according to Annex 8 CAO plus countercyclical buffer in accordance with Articles 44 and 44a CAO	8.0%		8.0%		7.8%
12d	Tier1 target ratio (in %) according to Annex 8 CAO plus countercyclical buffer in accordance with Articles 44 and 44a CAO	9.8%		9.8%		9.6%
12e	Total capital target ratio (in %) according to Annex 8 CAO plus countercyclical buffer in accordance with Articles 44 and 44a CAO	12.2%		12.2%		12.0%
Basel III leverage ratio						
13	Total exposure (CHF)	31'827'422		30'025'805		32'915'965
14	Basel III leverage ratio (Tier 1 capital % of the total exposure)	5.04%		5.00%		4.97%
14a	Basel III leverage ratio (Tier 1 capital % of the total exposure) without the effects of the transitional provisions for expected losses					
Liquidity Coverage Ratio						
15	LCR numerator: Total high quality liquid assets (HQLA) (3-month average) (CHF)	9'613'360	9'899'019	10'180'394	11'777'414	12'339'764
16	LCR denominator: Total net cash outflow (3-month average) (CHF)	5'366'717	5'574'801	6'202'652	6'868'191	7'237'597
17	LCR (in %)	179.1%	177.6%	164.1%	171.5%	170.5%
Net stable funding ratio (NSFR)						
18	Available stable refinancing (in CHF)	15'125'852		15'009'139		15'255'158
19	Required stable refinancing (in CHF) ¹	13'315'556		12'390'046		11'916'335
20	Net stable funding ratio (NSFR) (in %)	113.6%		121.1%		128.0%

¹ The figure reported for the 2023-06-30 is slightly different to what reported in the semi-annual report 2023, CHF 13'316.3 M, due to a re-calculation after publication. This difference is immaterial for the calculation of the NSFR ratio.

OVA: The bank's risk management approach

The qualitative disclosures on the bank's strategy and how the board of directors and senior management assess and manage risks, enabling users to gain a clear understanding of the bank's risk tolerance and appetite in relation to its main activities and all significant risks, are published in the Annual Report in the section "Risk management and risk control" (AR 2022, page 141ff.).

The above section of the Annual Report includes details about governance, strategies, processes and organisation for the monitoring and management of credit, counterparty, market and liquidity risks in the trading and banking books as well as operational risks on an enterprise-wide level. Furthermore, it is described how the firm business model connects to the bank risk appetite.

OV1 : Overview of risk-weighted assets

Table for banks with full publication requirement

(in 1'000 CHF)		a	b	c
		RWA	RWA	Minimum Capital Requirements
		2023-06-30	2022-12-31	2023-06-30
1	Credit risk (excluding counterparty credit risk (CCR))	2'317'838	2'183'871	185'427
2	of which determined using the standardised approach (SA)	1'630'036	1'612'257	130'403
3	of which determined using the internal rating-based (F-IRB) approach			
4	of which determined using the supervisory slotting approach			
5	of which determined using the advanced internal ratings-based (A-IRB) approach			
6	Counterparty credit risk (CCR)	143'664	156'918	11'493
7	of which determined using standardised approach (SA-CCR)	143'664	156'918	11'493
7a	of which determined using simplified standard approach (SSA-CCR)			
7b	of which determined using the Current Exposure Method (CEM)			
8	of which determined using the internal model method (IMM or EPE model methods)			
9	of which other (CCR)			
10	Valuation adjustment for risk derivatives (CVA)	35'079	44'911	2'806
11	Equity securities in banking book, determined using the market-based approach	27'180	27'187	2'174
12	Investments in managed collective investment schemes – look-through approach			
13	Investments in managed collective investment schemes – mandate-based approach	16'448	15'372	1'316
14	Investments in managed collective investment schemes – fall-back approach	14'264	13'812	1'141
14a	Equity investments in funds – simplified approach			
15	Settlement risk	225	154	18
16	Securitisation exposures in the banking book			
17	of which under the internal ratings-based approach (SEC-IRBA)			
18	of which under the external ratings-based approach (SEC-ERBA), including the internal assessment approach (IAA)			
19	of which under the standardised approach (SEC-SA)			
20	Market risk	1'513'944	1'279'987	121'116
21	of which determined using the standardised approach (SA)	1'513'944	1'279'987	121'116
22	of which determined using the internal model approach (IMA)			
23	Capital requirements due to a charge of exposures between the trading book and the banking book			
24	Operational risk	2'622'475	2'581'847	209'798
25	Amounts below the thresholds for deduction (amount subject to a risk weight of 250%)			
26	Adjustment of the floor			
27	Total (1+6+10+11+12+13+14+14a+15+16+20+23+24+25+26)	6'691'118	6'304'060	535'289

Liquidity: liquidity risk management (LIQA)

The main characteristics and elements of liquidity risk management are described in the Annual Report in section "4. Liquidity risk and refinancing" (AR 2022, page 147f.).

LIQ1: Liquidity: information on the LCR

(in 1'000 CHF)		Unweighted values (monthly averages)	Weighted values (monthly averages)	Unweighted values (monthly averages)	Weighted values (monthly averages)
		2nd Quarter 2023	2nd Quarter 2023	1st Quarter 2023	1st Quarter 2023
A. High-quality liquid assets (HQLA)					
1	Total high-quality liquid assets (HQLA)		9'613'360		9'899'019
B. Cash outflows					
2	Retail deposits and deposits from small business customers:	7'836'607	1'010'527	8'421'269	1'103'594
3	of which stable deposits	1'130'678	56'534	376'715	18'836
4	of which less stable deposits	6'705'928	953'994	8'044'554	1'084'758
5	Unsecured wholesale funding:	6'823'849	5'418'975	7'650'069	6'066'447
6	of which operational deposits (all counterparties) and deposits in networks of cooperative banks	92'084	17'452	0	0
7	of which non-operational deposits (all counterparties)	5'224'826	3'894'584	6'154'201	4'570'579
8	of which unsecured debt instruments	1'506'939	1'506'939	1'495'868	1'495'868
9	Secured funding deposited by non-financial institutions (without small business customers) (wholesale customers)		93		2'347
10	Additional outflows:	1'287'167	657'581	1'225'276	594'791
11	of which outflows related to derivative exposures and other collateral requirements	1'197'020	651'130	1'138'509	582'338
12	of which outflows related to loss of funding on debt products	0	0	0	0
13	of which credit and liquidity facilities	90'147	6'451	86'767	12'453
14	Other contractual funding obligations	0	0	33'333	33'333
15	Other contingent funding obligations	11'305'909	300'876	10'351'576	271'785
16	Total cash outflows		7'388'053		8'072'298
C. Cash inflows					
17	Secured lending (e.g. reverse repos)	16	16	10'777	10'777
18	Cash inflows from non-impaired receivables	2'968'088	1'777'232	3'285'499	2'137'262
19	Other cash inflows	314'935	314'935	429'261	429'261
20	Total cash inflows	3'283'039	2'092'184	3'725'537	2'577'300
Total adjusted values					
21	Total HQLA		9'613'360		9'899'019
22	Total net cash outflows ¹		5'366'717		5'574'801
23	Liquidity coverage ratio (LCR) (in %)		179.1%		177.6%

¹ Including the impact of collateral swaps.

LIQ2: Liquidity: information on NSFR

(in 1'000 CHF)		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	6 months to < 1 year	>= 1 year	
Information on the available stable funding (ASF)						
1	Equity instruments	2'229'031	0	0	101'365	2'330'396
2	Regulatory capital ¹	2'229'031	0	0	0	2'229'031
3	Other capital instruments				101'365	101'365
4	Demand deposits and/or term deposits of private customers and small business customers:	6'969'760	2'257'406	310'511	103'151	8'742'704
5	"Stable" deposits	1'100'773	10'800	1'300	0	1'057'229
6	"Less stable" deposits	5'868'987	2'246'606	309'211	103'151	7'685'475
7	Unsecured funding deposited by non-financial institutions (without small business customers) (wholesale customers):	1'832'668	410'016	6'745	0	1'124'715
8	Operational deposits	0	0	0	0	0
9	Non-operational deposits	1'832'668	410'016	6'745	0	1'124'715
10	Liabilities with matching interdependent assets	0	0	0	0	0
11	Other liabilities:	7'118'628	4'651'530	1'927'691	1'975'246	2'928'038
12	Derivative liabilities				132'240	
13	Other liabilities and equity instruments	7'118'628	4'651'530	1'927'691	1'843'006	2'928'038
14	Total available stable funding (ASF)					15'125'852
Information on the required stable funding (RSF)						
15	Total high-quality liquid assets (HQLA) NSFR	5'273'910	3'623'450	1'435'369	1'734'517	1'025'040
16	The bank's operational deposits held at other banks	495'120	0	0	0	247'560
17	Performing loans and securities:	2'519'274	3'704'947	1'603'362	7'102'149	9'126'938
18	Performing loans to companies in the financial sector secured with Category 1 and 2a HQLA	0	145'591	0	0	14'559
19	Performing loans to companies in the financial sector secured with non-Category 1 and 2a HQLA or unsecured	1'167'814	184'316	10'845	8'897	217'139
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and public sector entities (PSE), of which:	837'293	2'138'608	565'600	1'115'106	2'710'905
21	Risk-weighted up to 35% under the Basel II standardised approach for credit risk	0	0	0	0	0
22	Performing residential mortgages:	29'056	62'520	133'106	1'485'471	1'089'145
23	With a risk weight of less than or equal to 35% under the SA-BIS	25'637	59'382	128'282	1'429'233	1'035'652
24	Not-defaulted securities that do not qualify as HQLA, including exchange-traded shares	485'111	1'173'912	893'812	4'492'675	5'095'191
25	Assets with associated interdependent liabilities	0	0	0	0	0
26	Other assets:	2'691'490	76'244	10'476	638'686	2'893'157
27	Physical traded commodities, including gold	1'006'970				855'924
28	Assets posted as initial margin for derivative transactions and contributions to default funds of central counterparty				132'561	112'677
29	NSFR assets in form of derivatives				-178'225	0
30	NSFR liabilities in the form of derivatives prior to the deduction of variation margins posted				594'113	118'823
31	All remaining assets	1'684'520	76'244	10'476	90'237	1'805'734
32	Off-balance sheet items		40'283	38'419	123'403	22'860
33	Total required stable funding (RSF) ²					13'315'556
34	Net Stable Funding Ratio (NSFR)(%)					113.6%

¹ Regulatory capital before the application of capital deductions.

² This figure is slightly different to what reported in the semi-annual report 2023, CHF 13'316.3 M, due to a re-calculation after publication. This difference is immaterial for the calculation of the NSFR ratio.

CCA: Presentation of the main features of regulatory capital instruments

Group
Reporting date

Vontobel Holding AG
2023-09-30

1	Issuer	Vontobel Holding AG
2	Explicit Identifier (ISIN)	CH0419042566
3	Laws applicable to the instrument	Swiss Law
Regulatory treatment		
4	In accordance with the transitional provisions of Basel III	AT1
5	In accordance with the applicable rules upon the expiry of the Basel III transitional provisions	AT1
6	Eligible at stand-alone level, group level, stand-alone and group level	Group
7	Type of instrument (types to be specified by each jurisdiction)	Hybrid
8	Amount included in the regulatory capital (as of the most recent capital adequacy report) (in millions of CHF)	CHF 449.8 mn
9	Nominal value of instrument	CHF 450 mn
10	Classification from an accounting point of view	Debt issued (unsecured and subordinated)
11	Original issuing date	29 June 2018
12	With/without maturity	Call exercised per 31. October 2023
13	Original date of maturity	n.a.
14	Issuer has the option of an early termination, provided this is acceptable from a regulatory point of view	Yes
15	Optional call date, conditional call dates (for tax or regulatory reasons) and repayment amount	31 October 2023 in whole but not in part at par plus accrued interest
16	Later call dates, if applicable	any coupon payment date after first call date
Dividends / Coupons		
17	Fixed or variable dividends / coupons	Initially fixed then reset every five years
18	Coupon rate and index, where applicable	2.625% (Five-year CHF Mid-Market Swap Rate (or zero if negative) plus the Margin of 260.5bps)
19	Existence of a dividend stopper (no dividends on the instrument implies no dividends on the normal shares)	Yes
20	Interest /dividend payment: fully discretionary, partially discretionary or mandatory	Fully discretionary
21	Existence of step up or other incentive to redeem units	No
22	Non cumulative or cumulative	Non-cumulative
23	Convertible / non-convertible	Non-convertible
24	If convertible: conversion trigger (s)	n.a.
25	If convertible: fully or partially	n.a.
26	If convertible: conversion rate	n.a.
27	If convertible: mandatory or optional conversion	n.a.
28	If convertible, specify instrument type convertible into	n.a.
29	If convertible, specify issuer of instrument it converts into	n.a.
30	Write-down feature	Yes
31	If write-down: write-down trigger(s)	The CET1 Ratio as per the relevant Cut-off Date is less than 7.00%
32	If write-down: full or partial	Partial
33	If write-down: permanent or temporary	Permanent
34	If temporary write-down: description of write-off mechanism	n.a.
34a	Type of subordination	Contractual
35	Position in subordination ranking in case of a liquidation (indicating the type of instrument which has direct precedence in the ranking of the legal entity affected)	T2
36	Existence of characteristics which could jeopardize the complete recognition according to the Basel III regime?	None
37	If yes: describe these characteristics	n.a.

In case of any deviation between this table and the instrument documentation, the instrument documentation in question would be relevant.

CCA: Presentation of the main features of regulatory capital instruments

Group
Reporting date

Vontobel Holding AG
2023-09-30

1	Issuer	Vontobel Holding AG
2	Explicit Identifier (ISIN)	CH1224630090
3	Laws applicable to the instrument	Swiss Law
Regulatory treatment		
4	In accordance with the transitional provisions of Basel III	AT1
5	In accordance with the applicable rules upon the expiry of the Basel III transitional provisions	AT1
6	Eligible at stand-alone level, group level, stand-alone and group level	Group
7	Type of instrument (types to be specified by each jurisdiction)	Tier 1 Capital Notes
8	Amount included in the regulatory capital (as of the most recent capital adequacy report) (in millions of CHF)	Not yet included as of half-year 2023
9	Nominal value of instrument	USD 200 mn
10	Classification from an accounting point of view	Debt issued measured at amortized cost
11	Original issuing date	29 September 2023
12	With/without maturity	Perpetual
13	Original date of maturity	n.a.
14	Issuer has the option of an early termination, provided this is acceptable from a regulatory point of view	Yes
15	Optional call date, conditional call dates (for tax or regulatory reasons) and repayment amount	First Call Date: 29 September 2031 Early redemption possible due to a Tax or Regulatory Event. Subject to satisfaction of Conditions for Redemption. Redemption amount: aggregate principal amount, together with any accrued and unpaid interest thereon
16	Later call dates, if applicable	Every eight years after first call date
Dividends / Coupons		
17	Fixed or variable dividends / coupons	Initially fixed then reset every eight years
18	Coupon rate and index, where applicable	9.48% (Constant Maturity Treasury (linearly interpolated between 7 Year H15T7Y Index and 10 Year H15T10Y Index) rate plus the Initial Margin of 485 bps)
19	Existence of a dividend stopper (no dividends on the instrument implies no dividends on the normal shares)	Yes
20	Interest /dividend payment: fully discretionary, partially discretionary or mandatory	Fully discretionary
21	Existence of step up or other incentive to redeem units	No
22	Non cumulative or cumulative	Non-cumulative
23	Convertible / non-convertible	Non-convertible
24	If convertible: conversion trigger (s)	n.a.
25	If convertible: fully or partially	n.a.
26	If convertible: conversion rate	n.a.
27	If convertible: mandatory or optional conversion	n.a.
28	If convertible, specify instrument type convertible into	n.a.
29	If convertible, specify issuer of instrument it converts into	n.a.
30	Write-down feature	Yes
31	If write-down: write-down trigger(s)	With respect to any Publication Date, Trigger CET1 Ratio is less than 7%; or FINMA determines a write-down necessary to ensure Vontobel Group's viability.
32	If write-down: full or partial	Partial
33	If write-down: permanent or temporary	Permanent
34	If temporary write-down: description of write-off mechanism	n.a.
34a	Type of subordination	Contractual
35	Position in subordination ranking in case of a liquidation (indicating the type of instrument which has direct precedence in the ranking of the legal entity affected)	Rights and claims of all holders of Senior Obligations, subject to any obligations that are mandatorily preferred by law
36	Existence of characteristics which could jeopardize the complete recognition according to the Basel III regime?	None
37	If yes: describe these characteristics	n.a.

In case of any deviation between this table and the instrument documentation, the instrument documentation in question would be relevant.

CCA: Presentation of the main features of regulatory capital instruments

Group
Reporting date

Vontobel Holding AG
2023-09-30

1	Issuer	Vontobel Holding AG
2	Explicit Identifier (ISIN)	CH1224630108
3	Laws applicable to the instrument	Swiss Law
Regulatory treatment		
4	In accordance with the transitional provisions of Basel III	AT1
5	In accordance with the applicable rules upon the expiry of the Basel III transitional provisions	AT1
6	Eligible at stand-alone level, group level, stand-alone and group level	Group
7	Type of instrument (types to be specified by each jurisdiction)	Tier 1 Capital Notes
8	Amount included in the regulatory capital (as of the most recent capital adequacy report) (in millions of CHF)	Not yet included as of half-year 2023
9	Nominal value of instrument	USD 200 mn
10	Classification from an accounting point of view	Debt issued measured at amortized cost
11	Original issuing date	29 September 2023
12	With/without maturity	Perpetual
13	Original date of maturity	n.a.
14	Issuer has the option of an early termination, provided this is acceptable from a regulatory point of view	Yes
15	Optional call date, conditional call dates (for tax or regulatory reasons) and repayment amount	First Call Date: 29 September 2031 Early redemption possible due to a Tax or Regulatory Event. Subject to satisfaction of Conditions for Redemption. Redemption amount: aggregate principal amount, together with any accrued and unpaid interest thereon
16	Later call dates, if applicable	Every ten years after first call date
Dividends / Coupons		
17	Fixed or variable dividends / coupons	Initially fixed then reset every ten years
18	Coupon rate and index, where applicable	9.68% (Constant Maturity Treasury (10 Year H15T10Y Index) rate plus the Initial Margin of 509 bps)
19	Existence of a dividend stopper (no dividends on the instrument implies no dividends on the normal shares)	Yes
20	Interest /dividend payment: fully discretionary, partially discretionary or mandatory	Fully discretionary
21	Existence of step up or other incentive to redeem units	No
22	Non cumulative or cumulative	Non-cumulative
23	Convertible / non-convertible	Non-convertible
24	If convertible: conversion trigger (s)	n.a.
25	If convertible: fully or partially	n.a.
26	If convertible: conversion rate	n.a.
27	If convertible: mandatory or optional conversion	n.a.
28	If convertible, specify instrument type convertible into	n.a.
29	If convertible, specify issuer of instrument it converts into	n.a.
30	Write-down feature	Yes
31	If write-down: write-down trigger(s)	With respect to any Publication Date, Trigger CET1 Ratio is less than 7%; or FINMA determines a write-down necessary to ensure Vontobel Group's viability.
32	If write-down: full or partial	Partial
33	If write-down: permanent or temporary	Permanent
34	If temporary write-down: description of write-off mechanism	n.a.
34a	Type of subordination	Contractual
35	Position in subordination ranking in case of a liquidation (indicating the type of instrument which has direct precedence in the ranking of the legal entity affected)	Rights and claims of all holders of Senior Obligations, subject to any obligations that are mandatorily preferred by law
36	Existence of characteristics which could jeopardize the complete recognition according to the Basel III regime?	None
37	If yes: describe these characteristics	n.a.

In case of any deviation between this table and the instrument documentation, the instrument documentation in question would be relevant.