PARETO SECURITIES AS
GROUP

DISCLOSURE OF FINANCIAL INFORMATION
BASEL III – PILLAR 3
31-12-2016

UPDATED PR 4 APRIL 2017

Contents

Pareto Securities

1. Introduction

Basel III, the Capital Requirements Regulation and Directive IV ('CRR' and 'CRD IV'), involving, inter alia, an obligation for Pareto Securities AS with subsidiaries (the "Firm") to disclose risk management objectives and policies, management of risks, the nature of risk reporting and risk measurement, and financial information concerning capital adequacy pursuant to the requirements under Pillar 3 of the Capital Adequacy Regulations. The articles 431 to 455 of the CRR specify the Pillar 3 requirements in detail.

The CRD IV legislative package was partly implemented in Norway on 22 August 2014. The articles 431 to 451 of the CRR were included in the part of the legislative package implemented. The implementation introduced changes to the basis of preparation and disclosure requirements and includes certain remuneration disclosures and more detailed terms and conditions of capital resources, see Pareto Securities website; http://paretosec.com/financial-information.php

This Pillar 3 document describes the organisational structure and risk reporting of the Firm, as well as its policies and procedures for the management and control of risk. The approaches used for the calculation of credit risk, market risk and operational risk (Pillar 1) are described in the document. This report is intendent to complement the financial information and capital adequacy information found in the annual report available on the website; http://paretosec.com/financial-information.php

Furthermore, the report includes information about the Firm's internal capital adequacy process (Pillar 2).

This document is updated annually with data per year end. The information contained in the document has not been audited by the Firm's auditors, as this is not a requirement, and does not constitute any form of financial statement and must not be relied upon in making any judgement on the Firm.

The Firm regards information as material in disclosures if its omission or misstatement could change or influence the assessment or decision of a user relying on that information for the purpose of making economic decisions. If the Firm deems a certain disclosure to be immaterial, it may be omitted from this Statement.

2. Overview of the capital adequacy regulations – Basel 3

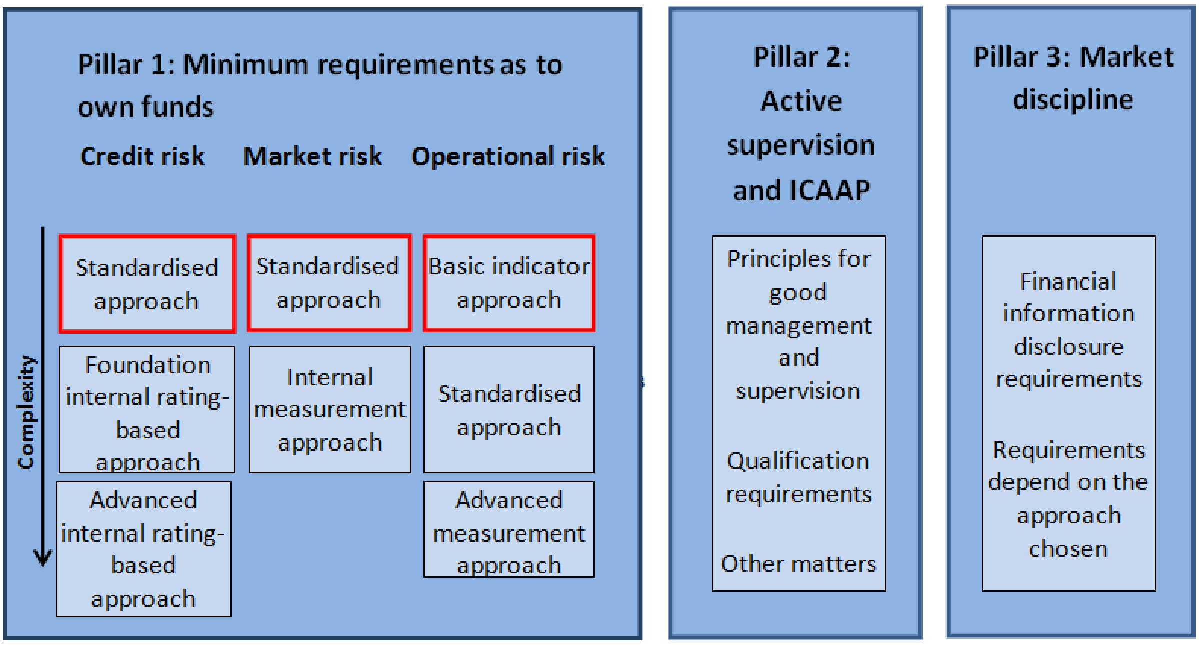
The objective of the capital adequacy regulations is to strengthen the stability of the financial system through:

- More risk-sensitive capital requirements
- Better risk management and control
- Closer supervision
- More information and transparency to the market

The capital adequacy regulations are made up of three pillars:

- Pillar 1:
  Covers the calculation of risk weighted assets for credit- and counterparty risk, market risk and operational risk, capital buffers and minimum requirements as to own funds.
- Pillar 2:
  The Firm's own internal capital adequacy assessment process ("ICAAP") which covers the consideration of whether additional capital is required over and above the Pillar 1 risk calculations, and the internal liquidity adequacy assessment process ("ILAAP") covering the Firm's liquidity and funding risk management framework.
- Pillar 3:
  Disclosure of information by firms and covers external communication of risk and capital information by financial institutions as specified in the Basel rules to promote transparency and good risk management.

Chart: Basel 3 – Overview of the pillars



Market discipline

Pillar 1 addresses the regulatory minimum requirements as to capital adequacy. The overall calculation basis is the sum total of the calculation bases for credit risk, market risk and operational risk. The Firm uses the following approaches to determine the calculation basis.

- *Credit risk - the standardised approach*:
  The credit risk weighted assets calculation is based on an estimate of the Exposure at Default (EAD) and assesses capital requirements using standard industry-wide risk weightings based on a detailed classification of asset types.
  - *Counterparty credit risk (CCR) – the mark to market method derivatives (MTM):*
    CCR arises from the risk that parties are unable to meet their future payment obligations under certain financial contracts such as derivatives. CRR differs from credit risk, above,

in how the EAD is calculated and applies to traded exposures. It arises where a counterparty default may lead to losses of an uncertain nature as they are market driven and is the sum of the current market value of the instrument plus an add-on (dependent on Potential Future Exposure, or PFE) that accounts for the potential change in the value of the contract until a hypothetical default of the counterparty.

- *Credit valuation adjustment (CVA) - the standardised approach:*
  The CVA is the capital charge accounting for potential MTM losses due to the credit quality deterioration of a counterparty (that does not necessarily default). CVA is the difference between the value of a derivative contract with a risk-free counterparty and that of a contract with the actual counterparty. It is a complement to the counterparty credit risk charge, that accounts for the risk of outright default of a counterparty. As for CCR, the standardised approach takes account of the external credit rating of each counterparty, and incorporates the effective maturity and EAD from the CCR calculation.

➢ *Market risk - the standardised approach:*
Risk weighted assets calculations for market risk assess the losses from extreme movements in the prices of financial assets and liabilities. A calculation is prescribed that depends on the type of contract, the net position at portfolio level, and other inputs that are relevant to the position. For instance, for equity positions a general market risk component captures changes in the market, while specific market risk is calculated based on features of the specific security.

➢ *Operational risk - the basic indicator approach:*
Capital set aside for operational risk is deemed to cover the losses or costs resulting from human factors, inadequate or failed internal processes and systems, external events as well as legal risk. To assess capital requirements for operational risk, the capital requirement is calculated as a percentage of the income, averaged over the last three years.

Pillar 2 addresses the requirements as to the firm's own process for the assessment of risk and whether additional capital is required over and above the Pillar 1 risk calculations. This includes, *inter alia*, a process for the assessment of overall capital needs in view of the Firm's risk profile, liquidity risk and a strategy for maintaining the needed capital level. In addition, Pillar 2 sets out guidelines for the evaluation process of the supervisory authorities with regard to the Firm's capital and liquidity adequacy assessment process.

The purpose of *Pillar 3* is to contribute to increased market discipline through requirements as to the disclosure of information. The Firm shall publish information concerning its capital level, capital structure and risk exposure that enables the market to better evaluate its risk profile and capitalisation, as well as its risk management and controls. The Pillar 3 framework requires the disclosure of information that supports the determination of capital buffers.

The Firm is by regulation required to have capital in the form of two capital buffers[1] above the Pillar 2 requirement:

➢ Countercyclical Capital Buffer (CCyB):
CCyB aims to achieve the broader macroprudential goal of protecting the financial sector from periods of excess aggregate credit growth that have often been associated with the build-up of system-wide risk.

[1] Implemented under Norwegian law, the CCyB and CCB are 1.5 % and 2.5 % of the risk weighted exposure amount calculated under Pillar 1. In Norway, the Firm is currently exempted from the capital buffer the requirements.

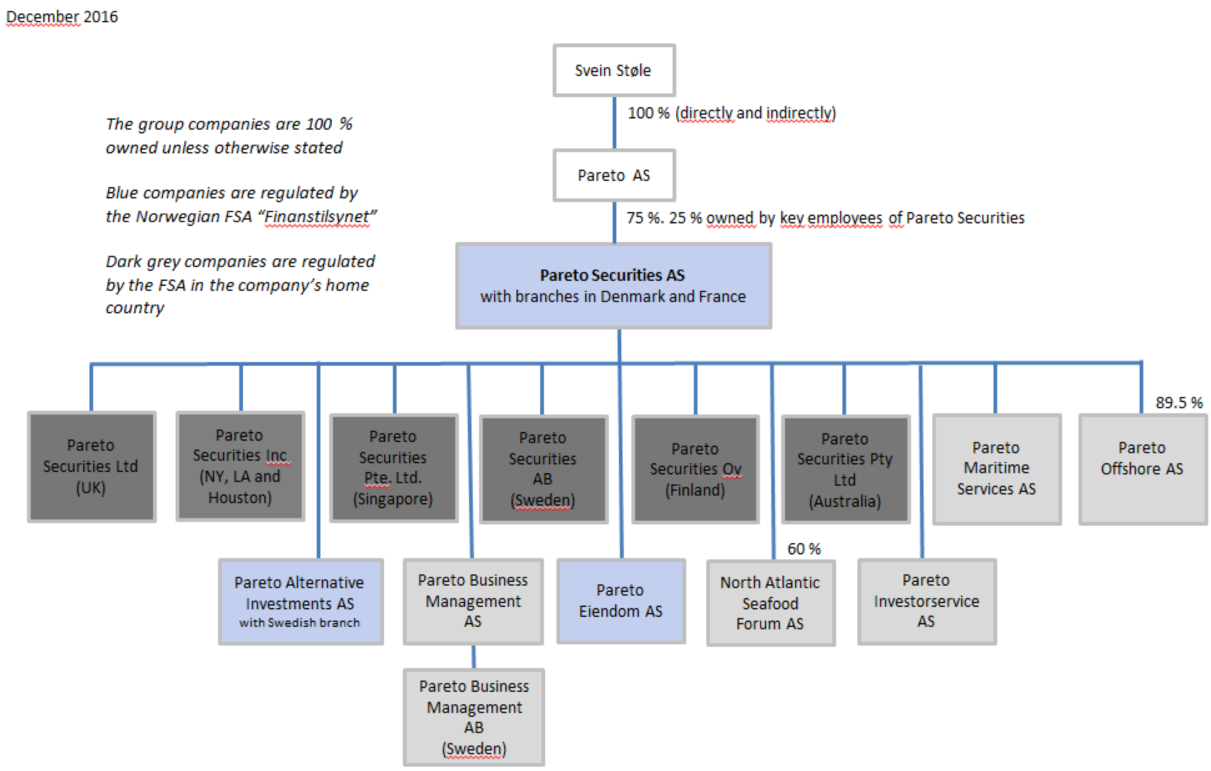
- Capital Conservation Buffer (CCB):
  The capital conservation buffer is designed to ensure that the financial sector build up capital buffers outside periods of stress which can be drawn down as losses are incurred. The requirement is based on simple capital conservation rules designed to avoid breaches of minimum capital requirements.

3. Group structure and scope of consolidation

The Firm's capital adequacy is presented on a consolidated basis and for the parent company Pareto Securities AS. The basis for consolidation is the same used for the reporting of capital adequacy to the Norwegian FSA. This scope of consolidation is also equal to that used for statutory accounting reporting for the Group's activities. For subsidiaries which are encompassed by rules for capital adequacy, the capital adequacy is disclosed on solo basis in Appendix A. Subsidiaries which are not regulated and thereby not encompassed by capital adequacy rules are not included in Appendix A. However, all subsidiaries are a part of the Firm's consolidated capital adequacy. All disclosures published for the Firm and subsidiaries are based on regulatory capital adequacy as of 31 December 2016, unless otherwise stated.

Pareto Securities is an investment firm under the supervision of the Financial Supervisory Authority of Norway. Pareto Securities with subsidiaries is 75 % owned by the parent company Pareto AS, which is 100 % owned (directly and indirectly) by Svein Støle (Norwegian private person). The main focus of the Firm is broking of equity and bonds, corporate finance services and analysis. The ownership and company structure is presented in the chart below:

Chart: The corporate structure of Pareto Securities AS per December 2016



3.1 Group structure and consolidation

Investments in subsidiaries are measured at acquisition cost in the company's financial statement. If impairments are not expected to be temporary, write-downs to fair value will be carried out. Foreign branches are incorporated in the parent company's financial statements based on the same principles as other branches of the company. The acquisition cost of shares in subsidiaries are in the group accounts eliminated against the equity of the subsidiary at the date of establishment. The earnings of subsidiaries and associated companies are recognised by using the equity approach. Internal transactions between the companies as well as receivables and payables per 31 December, are eliminated in the consolidated financial statements. No sale or liquidiation har occurred over the past year. Foreign exchange loss and gains from translation of foreign subsidiaries, and from hedging, is recorded to equity. See note 14 in the annual report.

Table: Shares in subsidiaries as per December 2016

Name of firm	*Equity portion in NOK thousands*	*Ownership stake in %*
Pareto Securities Ltd	21 820	100
Pareto Securities Inc	22 955	100
Pareto Securities Pte Ltd	16 414	100
Pareto Securities AB	161 482	100
Pareto Securities Oy	13 684	100
Pareto Securities Pty Ltd	1 394	100
Pareto Alternative Investments AS	21 044	100
Pareto Maritime Services AS	526	100
Pareto Offshore AS	10 293	89.50
Pareto Business Management AS	9 193	100
Pareto Business Management AB	1 859	100
Pareto Eiendom AS	127	100
Pareto Investorservice AS	999	100
North Atlantic Seafood Forum AS	396	60

The Firm have no ownership stakes in companies, outside the trading book, other than those disclosed above.

3.2 The companies

3.2.1 Pareto Securities AS

Pareto Securities is an independent investment firm and offers stock, bond and foreign exchange broking, analysis and financial advice (corporate finance) in connection with capital raising, offerings, mergers and acquisitions. The company has its head office in Oslo, a regional office in Stavanger, and branch offices in Copenhagen and Paris, and forms part of the Pareto Group. The company is under the supervision of the Norwegian Financial Supervisory Authority. The company is a major player in the high yield bond market based on Norwegian law and a global player within the sectors oil, offshore, shipping and natural resources.

In April 2015, Pareto Securities AS merged with its sister company Pareto Project Finance (PPF), with Pareto Securities AS being the acquiring company. The Project Finance division is a leading arranger of and capital raiser for investment projects within real estate, shipping, offshore and energy. In addition, the division operates a trading desk to provide second-hand trading in projects and companies arranged by Project Finance.

3.2.2 Pareto Securities Ltd

The British investment firm Ocean Equities Ltd. with office in London, was acquired in December 2013 and changed its name to Pareto Securities Ltd. The company is particularly focused on capital raisings for the international mining and commodities industry. The company is under the supervision of the Financial Supervisory Authority in the UK.

3.2.3 Pareto Securities Inc

In 2009, Pareto Securities acquired all shares of the New York-based company Nordic Partners, and renamed it Pareto Securities Inc. The subsidiary has a position as a broker of Norwegian equities and bonds amongst North American institutional investors. The company is working closely with the headquarter in Norway to offer equity and debt financing to North-American issuers within energy, shipping and oil services. The company is under the supervision of the Securities and Exchange Commission in the US and holds a licence to provide both corporate finance and broking services.

3.2.4 Pareto Securities Pte Ltd.

The subsidiary in Singapore was established in 2006. The company is particularly focused on capital raise assignments on behalf of issuers in the sectors of energy, shipping and offshore. The company is under the supervision of the Monetary Authority of Singapore and holds a licence to provide both corporate finance and broking services.

3.2.5 Pareto Securities AB

In 2011, Pareto Securities acquired the investment firm E.Öhman J:or Fondskommission AB and renamed it Pareto Securities AB. The subsidiary, with offices in Stockholm and Malmö, is under the supervision of the Swedish Financial Supervisory Authority and provides services within stock and bond broking and corporate financial services in Sweden. The company's main focus is in the areas of broking, raising capital and analysis and the company has a strong position in the Swedish corporate high yield bond market.

3.2.6 Pareto Securities Oy

In 2012, Pareto Securities acquired the investment firm E.Öhman J:or Fondskommission Finland Oy AB and renamend it Pareto Securities Oy. The subsidiary, which is based in Helsinki, provides services within stock and bond broking and financial advice with focus on raising capital in Finland and is under the supervision of the Financial Supervisory Authority of Finland.

3.2.7 Pareto Alternative Investments AS

Pareto Alternative Investments (PAI) was spun off from PPF and established in 2015. PAI manages a broad range of direct investment funds within the real estate, shipping and offshore. PAI is authorised in accordance with the Alternative Investment Fund Managers Directive (AIFMD) and is under the supervision of the Financial Supervisory Authority of Norway.

3.2.8 Pareto Maritime Services AS

Pareto Maritime Services AS was established in 2011 offers in-house technical expertise and disponent owner/commercial management services in selected shipping projects. The company have a portfolio of projects with a broad spectrum of ship types and charterers based in Europe, the Middle East and the Far East.

The company's objective is to provide comprehensive technical support services in shipping-related matters to its clients. It sets out to complement the purchasing process of shipping projects and, through an established ISO 9001 Quality Management System incorporating continuous improvement, provide investor confidence and credibility throughout the lifetime of the projects.

3.2.9 Pareto Offshore AS

The subsidiary Pareto Offshore, which was established in 2004, has its office in Oslo and is a leading provider of offshore rig brokering and advisory services to the global drilling industry and financial community.

3.2.10 Pareto Business Management AS

Pareto Business Management AS (PBM) was established in 1986 as a project management unit. The company offers a complete range of asset management services to more than 180 single-purpose companies within real estate, shipping & offshore.

Functioning as full range project managers, PBM is actively involved in and supports the entire lifespan of the various single-purpose companies (SPCs) that are set up by the Project Finance division. PBM is involved from the initial purchase phase up to the completion of the project when the assets are sold and the relevant SPC is liquidated. The management team handles all aspects of daily operations, such as monitoring lease and loan agreements, maintenance supervision, accounting, tax reporting and the provision of advisory services.

PBM has a subsidiary in Sweden, offering the same services as the parent company.

3.2.11 Pareto Eiendom AS

The company holds a real estate license but the the activity is very limited.

3.2.12 North Atlantic Seafood Forum AS

North Atlantic Seafood Forum purpose is soly to organize the annually conference - North Atlantic Seafood Forum in Bergen, Norway.

3.2.14 Pareto Securities AS – branchs

The branchs in Copenhagen and Paris provides financial advice and bond broking in Copenhagen.

3.3 The main services

3.3.1 Broking

Pareto Securities provides stock, bond and foreign exchange broking. Pareto provides investment advice based on thorough analyses. The company offers investors a combination of ongoing dialogue with analysts and brokers, investor visits from analysts, local events with corporate executives (road shows and conferences) and an efficient Internet trading solution. The combination of local presence and international investor contacts forms the basis for the ability of Pareto Securities to raise funds in the stock and bond markets and its placing power. International clients account for a considerable part of the client base, which enables the company to place many large and complex projects.

3.3.2 Analysis – equity and credit

Equity Research team covers a broad range of companies and industries, including Oil Services, E&P, Shipping, Seafood, Industrials, Financials, Real Estate, Life Science, Telecoms and Natural Resources. Pareto Securities has active coverage of most listed companies in Oslo, Stockholm and Helsinki, in addition to the most important international peers. The research product includes fundamental company and industry research, sector research, quarterly reporting updates, monthly model portfolio and daily morning reports.

Credit Analysis follows the Nordic credit markets, and performs credit evaluations for the primary and secondary markets. For new issues the team gives an assessment of the credit quality of each new issuer, and maintains post-issue market awareness through regular credit updates. To enable secondary market liquidity, the team provides daily market updates, and a variety of research products giving Pareto Securities a strong secondary market position.

3.3.3 Corporate finance

Pareto Securities provides advice relating to the raising of equity or loans, offerings, secondary sales, mergers/demergers, valuations and acquisitions/divestments of businesses or companies. The advisory activities have a special focus on businesses that are listed or offer a potential for an initial public offering within a reasonable time horizon. The company holds a leading position in the Nordic capital markets and within the global energy sectors.

The corporate finance activities are built around long-term relationships with corporate clients, and based on a combination of in-depth industry knowledge and strong professional skill. The team is made up of professionals with comprehensive expertise gained from their experience in consultancy, capital markets and a variety of corporate backgrounds. Pareto Securities has in-depth industry knowledge, strong professional expertise and a global presence across Europe, North America, Asia and Oceania.

3.3.4 Project finance

Project finance is a leading arranger of and capital raiser for investment projects within real estate, shipping, offshore and energy.

Project finance offers everything from single projects to complicated financial solutions related to major real estate, shipping and offshore projects and companies. Project finance has representation in Oslo, Stockholm, London, Singapore and New York.

The division have 3 focus areas:

1. **Real estate** operates within all types of property transactions. Primarily focus on well-structured long lease investments with solid tenants. Pareto Securities holds a leading position in the Nordic real estate market.
2. **Shipping, offshore and energy;** expertise in structuring, syndication and management of investment projects. Primary focus is well-structured projects with long charter parties.
3. **Project sales** secures equity in new issues and provides liquidity for projects arranged by Pareto Securities. 2nd hand trading is an important business area within project finance and the sales team are focusing on creating liquidity in the projects arranged by project finance.

3.4 Limitations as to the transfer of capital or the repayment of debt between group companies

The transfer of capital between the mother company and subsidiaries is not subject to any contractual, private law or other actual limitations. In general, the scope for transferring capital or repaying debt between the companies within the group is governed by the legislation applicable to the industry at any given time.

3.5 Sub-ordinated loans and guarantees with group companies

The Firm has provided a guarantee to the Monetary Authority of Singapore for coverage of any obligations limited to SGD 12 million for the subsidiary Pareto Securities Asia Pte Ltd. The guarantee is included in the capital adequacy reporting (credit risk) for the parent company with a risk-weight of 50 % and eliminated on consolidated level.

The Firm have subordinated loans outstanding with subsidiaries as show below.

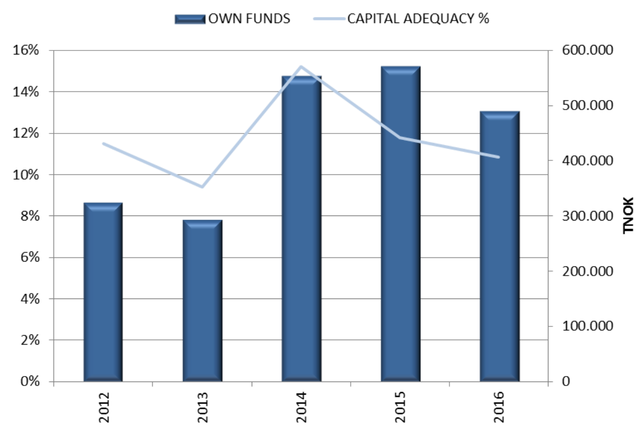
Table: Subordinated loans to subsidiaries

Company	Currency	Interest rate	Loan amount (thousands)	Issued	Maturity[2]
Pareto Securities Inc.	USD	5%	3 118	12.6.2009	31.12.2017
Pareto Securities Inc.	USD	5%	800	2003/-06	31.12.2017

4. Own funds and capital adequacy – Pillar 1

The chart below shows developments in own funds and capital adequacy for the period 2012 to 2016. The figures are calculated on a consolidated basis by applying the regulatory provisions applicable to the relevant period and using filed December reports for each individual year.

Chart: Annual capital adequacy and own funds



Below follows a specification of own funds and capital adequacy at Pillar 1 level for the Firm and the mother company Pareto Securities AS as per 31 December 2016. The figures are as reported to the Norwegian FSA by deadline 11 February the following year.

For subsidiaries of Pareto Securities AS which are subject to supervision and a regulatory framework governing capital adequacy and own funds, the capital adequacy are presented in appendix A. Due to differences in capital adequacy regulations, the figures may not be directly comparable. Subsidiaries which are not subject to supervision and a regulatory framework governing capital adequacy are not included in appendix A. Due to the merger with PPF in April 2015, own funds and capital adequacy is not directly comparable with Pillar 3 reports before this date.

[2] Loans to Pareto Securities Inc. are automatically extended with maturity date another year when approaching one year to maturity.

Pareto Securities

4.1 Specification of own funds and capital adequacy

Consolidated and parent company own funds and capital adequacy as per 31 December 2016:

Company	**Pareto Securities Group**	**Pareto Securities AS (parent)**
Amounts in thousands	***NOK***	***NOK***
Paid-up capital instruments	80 000	80 000
Share premium	13 900	13 900
Own CET1 instruments	0	0
Previous years retained earnings	379 527	336 766
Other reserves	26 808	8 369
Value adjustments	- 849	- 77
Deferred tax benefit	-2 000	0
Intellectual property	- 7 606	- 2 979
Tier 1 capital (CET1)	**489 780**	**435 979**
Tier 2 capital	0	0
Own funds	**489 780**	**435 979**
Total risk weighted exposure amount	**4 517 585**	**3 129 660**
Capital Adequacy – Ratios		
CET1 Capital ratio	10,8 %	13,9 %
T1 Capital ratio	10,8 %	13,9 %
Total capital ratio	10,8 %	13,9 %
Leverage ratio	21,7 %	38,6 %
Risk weighted exposure amount		
Credit risk	591 713	687 929
Settlement risk	3 429	3 429
Market risk	89 098	9 354
Foreign exchange risk	467 352	369 196
CVA risk	3 634	3 634
Operational risk	3 362 358	2 056 118
Total risk weighted exposure amount	**4 517 585**	**3 129 660**
Capital requirement		
Credit risk	47 337	55 034
Settlement risk	274	274
Market risk	7 128	748
Foreign exchange risk	37 388	29 536
CVA risk	291	291
Operational risk	268 989	164 489
Total minimum capital requirement	**361 407**	**250 373**

Risk weighted exposure amount per exposure class credit risk		
Regional governments or local authorities	114 602	50 740
Institutions	279 547	108 359
Corporates	37 545	7 444
Retail	15 575	0
Other items	390 840	521 385
Total risk weighted exposure amount	**838 109**	**687 929**
Exposure amount credit risk for significant geographic areas		
Norway	385 448	279 933
Sweden	296 279	151 538
Singapore	9 775	58 038
Great Britian	17 422	54 413
USA	34 641	52 121
Finland	15 338	19 013
Total risk weighted exposure amount	**758 902**	**615 054**

4.2 Summary of regulatory capital requirements

The Firm has limited structural risk on its balance sheet and limited loss potential, compared to banks and investment firms with proprietary trading and/or credit and lending as an important part of their business strategies. The Firm's exposure and capital requirements are primarily related to operational risk. It follows from the specification above that capital requirements relating to operational risk accounts for the main part of the overall capital requirement. Foreign exchange risk is mainly related to the ownership interest and inter-company balances with the foreign subsidiaries.

4.3 General information about credit risk and a specification of credit risk

Credit risk is mainly related to bank deposits with the largest Nordic banks, inter-company balances, short term receivables and settlement of financial transactions. The Firm does not engage in the granting of credit or lending to clients with the exception for subsidiary Pareto Securities AB as described below. The Firm does not make use of credit derivatives, whether for hedging, held for own exposure or on behalf of others. The Firm does not have a credit rating. The Firm does not accept guarantees or security interests as security.

Wrong-way risk is being identified in all credit exposures, and handled and limited in accordance with Board instruction. The Firm's wrong-way risk is low.

Settlement risk is handled by way of that the delivery vs payment principle form the basis for settlement of financial instruments.

Loans and receivables are measured at amortized cost. Lending to the public is recognized in the balance sheet after deductions for actual and anticipated credit losses. Actual losses are those judged to be amount finalized. Anticipated credit losses refer to the difference between the loan amount and the amount that is expected with regard to the borrower's repayment ability and collateral value. Accounts receivable and other receivables are stated at the amount expected, and assessed individually. Actual and anticipated credit losses are negligible.

The Firm's impaired exposures, past due exposures and changes in the specific and general credit risk adjustments for impaired exposures are non-material and not included herein.

Pareto Securities AB - credit risk related to securities financing transaction

The subsidiary in Sweden assumes credit risk by lending to the public through services related to securities financing transactions. Clients are granted a credit facility for purchasing and borrowing of securities through Pareto Securities, and which is secured by collateral (financial instruments). The actual credit exposure is curtailed by credit evaluation of the client, the collateral furnished by clients and credit limits in accordance with credit policy and limits adopted by the board.

Pareto Securities has more than 1 200 deposit clients of which approx. 350 have a credit facility and 60 % represent an actual exposure. Avarage gross exposure (lending) to clients during 2016 is MSEK 160 while the net exposure calculated in accordance with the capital regulation is MSEK 30-40. Concentration risks are limited and controlled daily. Concentration risks are not considered material in terms of Pillar 2 capital and the company's own funds.

The utilisation of credit lines (debt-to-asset ratios) are usually low, ranging from 15-40 % in a five-year perspective. Historical losses related to securities financing transactions are low compared to gross lending and own funds. Since 2001, credit related losses accumulates to less than MSEK 5 and no losses have materialised since 2009. As such, the credit risk is considered to be low.

The table below summarises the financial instruments which are used by clients as collateral. Large Cap, Mid Cap and Small Cap are defined in accordance with the classification applied by the Stockholm Stock Exchange (NASDAQ), and represent 78 % of the total when taken together. Large Cap, which represents more than 50 % of the market value of the collateral, is assumed to be swiftly realisable with only minor price effect.

Table: Composition of collateral as of December 2016

Type	TSEK	Percent of total	Haircut
Large Cap	55 976	52 %	Min 15%
Mid Cap	21 322	20 %	Min 30%
Small Cap	6 294	6 %	Min 50%
Not recognised exchanges	21 024	19 %	Conservative
Corporate bonds	603	0 %	Conservative
Funds	3 078	3 %	Conservative
SUM	**108 297**	100%	

4.4 Specification of counterparty risk derivatives as per 31 December 2016

Only the mother company and the subsidiary in Sweden (volumes in Sweden are very low) offers trading for hedging purpose in derivatives, mainly in FX derivatives. For all derivatives contracts the Firm enters into with clients, the market risk is hedged "back-to-back" with large international institutions the Firm have ISDA and CSA agreements with. As such, the firm has no risk appetite for market risk derivatives. The Firm uses the mark-to-market method to calculate counterparty risk for derivatives. The Firm has entered into netting and off-set agreements and the Firm practices netting with derivatives counterparties where it can be applied. Derivative contracts are mark-to-market daily and collateral is exchanged daily with the counterparties. Collateral consists of cash on pledged accounts. Market risk may arise if the counterparty defaults on its obligations but collateralisation curtail the risk. The value of the collateral is not dependent of a credit ratings or the development in market prices.

A credit committee derivatives approves all clients before derivatives trading can commence. Counterparty exposures are also limited through exposure limits, and restrictions to contract types and tenors. The Firm accepts smaller credit lines for the institutional counterparties and selected creditworthy clients but credit related losses for the derivatives business are negligible.

Table: Counterparty risk derivatives

	NOK thousands
Exposure value	12 010
Capital requirement	961
Gross fair value	37 932
Net fair value	28 385

5. Interest rate risk outside the trading book

Interest rate risk is the risk of loss upon changes in the interest rate level, and as a result of the assets and liabilities being subject to different interest rate maturities.

Interest rate risk is measured both on and off balance sheet. The Firm carries little interest rate risk on and off its balance sheet as the result of no interest-bearing debt and no need for refinancing in the market. The Firm invests surplus liquidity with large Nordic banks and in short-term, liquid securities; government securities, covered bonds and repos. The Firm has low exposure to changes in short- and long-term interest rates beyond the effect on invested liquidity reserves and surplus capital.

The custody account service offered in Sweden (see chapter 4.3) represents a potential interest rate risk as the subsidiary borrows from clients and lends out to clients. As both the borrowing and the lending in principle are short and have variable interest rates, the interest rate risk is deemed low. The subsidiary has limited need of refinancing even in a scenario where a great share of the client borrowing is withdrawn immediately.

Summarised, the Firm do not conduct liquidity transformation as a business, the same way that banks do by borrowing short and lending long term, and the total interest rate risk is low.

6. Securitisation and rating agencies

The Firm is not engaged in securitization and does not make use of rating agencies for capital adequacy purposes.

Pareto Securities

7. Internal control and capital assessment process

7.1 Overview of risk management and internal control

The management of the Firm falls under the auspices of the Board of Directors. The Board of Directors shall ensure that the activities of the Firm are organised in a prudent manner, including all ongoing management and control. Consequently, it is the responsibility of the Board of Directors to ensure that the internal controls of the Firm provide adequate and systematic safeguards against material risks.

The Board of Directors has, against this background, prepared a set of instructions and procedures to ensure prudent operation and adequate control of the Firm. All employees are obliged to understand and comply with the applicable internal instructions and procedures.

By internal controls are meant a process, initiated by the Board of Directors, and executed by the management and employees, to provide reasonable assurance that objectives will be met within the following areas:

- Ensure compliance with statutes, rules and regulations
- Ensure updated and reliable financial reporting
- Prevent material losses

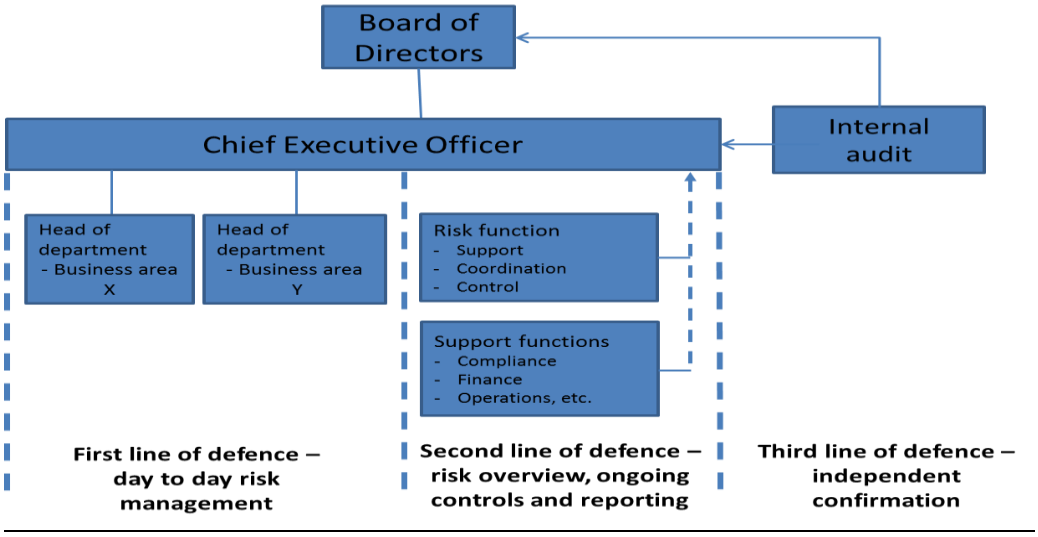
The Chief Executive Officer is responsible for implementing risk management measures that contribute to realising the objectives defined for the Firm by the Board of Directors, including effective management systems and internal controls. The Chief Executive Officer has established such a control structure, based on an assessment of relevant risks. The responsibility for risk management resides at all levels of the Group, from the Board and the Chief Executive Officer down through the organisation to each business manager and employee. These responsibilities are distributed so that risk/return decisions and controls are: taken at the most appropriate level; as close as possible to the business and the risk; and, subject to robust and effective review and control. The responsibility for effective review and control resides at all levels.

The Firm has a Compliance Department as well as a dedicated Risk Department, and these reports independently of each other to both the Chief Executive Officer and the Board of Directors. The Chief Executive Officer reports to the Board of Directors in board meetings, and whenever else deemed necessary by him.

At least once annually, the Firm undertake a review of all major risks for all business areas. A systematic review of risks, the risk management and internal controls are made to assess if the Firm's risks are handled in a prudent manner. The self-assessments of internal control are conducted in order to identify the operational risks of the company by way of an identification of key risks, a risk assessment, and an evaluation as to whether established control measures are adequate and work as intended or whether there is a need for establishing additional risk-reducing measures. The result of the self-assessment is reported to the Board of Directors. The report which is subject to audit by internal audit, provides an overall assessment of the risk situation and the internal control in the Firm.

The distribution of responsibilities for risk management and internal controls are based on the principles of the three lines of defence (see the chart below). The distribution of responsibilities is made operational through the business concept, objectives and strategies of the Firm, the risk culture, and authorisations, job descriptions, as well as internal instructions and procedures.

Chart: The three lines of defence for risk management and internal controls



- First line of defence
  - Line managers have ongoing responsibility for risk management within their areas of responsibility, including operational risks. They have primary responsibility for identifying, assessing, handling, controlling and reporting risk.
- Second line of defence
  - The support functions (compliance and risk) shall assist the Board of Directors, the Chief Executive Officer and line managers with risk management and internal controls, as well as control and review implemented measures.
  - Other support functions shall contribute to the business realising its objectives.
- Third line of defence
  - The Board of Directors needs assurance that risks are managed in an effective manner and in accordance with the guidelines established by the Board of Directors.
  - Internal audit shall provide the Board of Directors with an independent evaluation of established risk management and internal control processes and procedures.

7.2 Overview of the regulatory framework and assessment of internal capital under Pillar 2

Pillar 2 imposes requirements as to the self-assessment of the Firm’s risks and internal capital needs beyond those implied by Pillar 1, under the designation Internal Capital Adequacy Assessment Process. Each of the consolidated companies that fall within the scope of the regulatory framework pertaining to capital adequacy prepares an ICAAP in compliance with the requirements, at least annually. Pillar 2 includes the Internal Liquidity Adequacy Assessment Process (“ILAAP”) covering the Firm’s liquidity and funding risk. ILAAP is described in section 7.3 under liquidity risk.

The purpose of the ICAAP is to ensure that the total own funds of the Firm are commensurate with its business, risk profile and a strategy for preserving its capital level. The ICAAP also provides a description of approaches and controls used by the Firm to manage risk. A further objective is to describe long-term strategic, market factors and stresstests, including severe economic downturn lasting at least three years, that may influence future capital needs. The consolidated capital requirement of the Firm are based on a consolidated assessment of the Firm; the computed capital requirement for the mother company, each of the subsidiaries ICAAP and a consolidation of risk exposures of the Firm. The ICAAP is deliberated by senior management and by the Board of Directors. The group's processes with regard to risk and capital management operate on an ongoing basis, and improvements and the development of approaches take place continuously.

Under Pillar 2, the company calculates capital for all main types of risk assumed by the company through its activities, by way of a three-stage procedure:

- First, the minimum capital requirement is calculated by using the approaches adopted for the calculation of Pillar 1 requirements;
- next, capital is calculated for Pillar 2 by assessing (based on the business strategy, scenario analyses, stresstests etc.) the various types of risk to which the company is or may be exposed to, the costs or earnings effects that may be suffered on the basis thereof, and how much capital these might lay claim to;
- finally, an assessment is made as to whether the Pillar 1 requirement is sufficient to cover risk and the capital needs, or whether the Pillar 2 calculation has uncovered a need for supplementary capital corresponding to all or part of the Pillar 2 calculation.

The Firm's own funds shall be at a level that ensures that the Firm maintains the necessary capital adequacy also in the event of revenue shortfall and/or unexpected loss followed by a long severe economic downturn.The Firm evaluates its capital requirement on the basis of scenarios covering unfavourable future market developments within credit risk, market risk, operational risk, business risk and other categories of identified risk. The capital supplement under Pillar 2 is principally assessed on the basis of the Firm's risk appitite of various specific risks, scenario-based analysis and stress tests and other events which may influence the earnings and capital base of the Firm.

7.3 Risk categories, management and control

The Firm analysis and evaluates the risk and calculates additional Pillar 2 capital requirement (if deemed necessary) for the following risk categories:

1. credit and counterparty risk;
2. market risk;
3. operational risk;
4. liquidity risk;
5. concentration risk;
6. ownership risk;
7. systemic risk;
8. commercial risk, including reputational risk.

General observations concerning the Firm
The Firm rely on a sound risk culture throughout the organisation.

Risk culture is the set of objectives and practices, shared across the organisation, that drive and govern risk management. The main elements of risk culture at the Firm are broadly aligned with the Financial Stability Board's guidance:

1. Tone from the top: our purpose, value and behaviours, the Firms global code of conduct, and global induction processes all support the embedding of risk culture and values by setting a consistently clear, shared message to all colleagues;
2. Accountability: key risk frameworks set out clear responsibilities;
3. Effective communications and challenge: clearly defined and independent control functions (second line of defence) and internal audit (third line of defence), enhanced training on risk and citizenship, and channels for escalation and whistle blowing enable the effective control of risks at all levels;
4. Incentives: the Global Partnership, and the risk and controls objective within the performance and promotion process has helped to align incentives with a sound risk culture; and
5. Consequence: a clear and transparent consequence culture if not aligning with the Firm's risk culture.

The Firm and its employees shall at all times be in compliance with applicable statutes, regulations and rules, and hold the necessary permits from government authorities in Norway and abroad.

The Firm has low fixed costs and has always been profitable. Its operations are not depleting the own funds of the Firm through operating losses. Surplus liquidity relating to the ongoing operating profits of the company is invested in low risk and liquid assets such as Nordic covered bonds, repos and deposits with large Nordic banks.

The Firm has a conservative attitude to risk.

The Firm is not involved with traditional banking business such as deposits and lending, and granting of credit to clients. The Swedish subsidiary are involved with securities financing transactions such as securities lending and margin lending transactions in exchange for collateral in the form of securities. This activity is described above.

The Firm does not engage in own-account trading in financial instruments as part of its own asset management or to make profits based on market price movements. The Firm may invest in the trading book to support broking or capital raising assignments. Investments in the trading book are approved by the Chief Executive Officer and have a short time horizon.

Operational risk is a material risk on the part of the Firm and is curtailed through well functioning internal instructions and procedures, employee training and high compliance consciousness. Internal controls and self-assessment are key measures, and are used deliberately to limit the operational risk associated with business activities.

The Firm is owned by key employees (25 %) and one external owner (75 %) with a strong financial position. The Firm is ungeared and has no external borrowings. The Firm has at all times sought to have sufficient cash balances and drawing rights to provide for a minimum of two months' worth of overheads. An impact on the wider economy/ financial system in the event that the Firm was to fail is considered negligible.

1. *Counterparty and credit risk*

Counterparty and credit risk are risks of losses as the result of the counterparties and clients of the Firm failing to meet their payment or delivery obligations to the Firm, and any collateral not being realisable or having to be realised at a loss.

The Firm`s counterparty and credit risk exposure is described in sections 4.3 and 4.4 above. Historically, the Firm has negligible losses related to credit- and counterparty, even during periods with stress, such as the financial crisis in 2008-2009.

The Firm's counterparty and credit and risks are considered moderate and losses linked to credit risk are negligible in terms of Pillar 2 capital. The Firm`s Pillar 2 capital requirement is not higher than the capital requirement calculated under Pillar 1.

2. *Market risk*

Market risk refer to the risk of loss on the part of the Firm as the result of positions in the fixed-income and equities markets, in foreign exchange or in derivatives.

The Firm has a business model based on client trading, broking and advice in connection with capital raising. The Firm does not engage in regular proprietary trading, neither in equities, fixed-income, foreign exchange nor derivatives. The Firm may enter into equity or fixed-income positions in its trading book in relation to broking, market making (minor activity in Sweden) and corporate finance assignments (capital raisings). Positions in the trading book shall have a short time horizon and shall be approved by the Chief Executive Officer in conformity with limits laid down by the Board of Directors. The risk function is responsible for daily reporting of positions and risks in the trading book and control of positions being in compliance with approved limits.

The Firm's Pillar 2 capital requirement is higher than the Pillar 1 capital requirement due to the fact that the Pillar 2 capital is calculated based on position limits, while the Pillar 1 capital is calculated on actual positions. Actual positions are usually well below the position limits approved by the Board.

The Firm does not have equity positions outside the trading book, other than the ownership of subsidiaries. The Firm holdes no Pillar 2 capital for positions outside the trading book.

Derivatives positions and short positions are not held in the trading book. See also section 4.4 above.

Net interest rate risk is the amount the company's total net interest income will change with the next 12 months if interest rates change by one percentage point. It reflects the disparity in items on and off the balance sheet when interest rates pricing periods, volumes or reference price of assets, liabilities and derivatives do not correspond to each other exactly. The company has no significant structural interest rate risk on or off the balance sheet and it is not identified a capital requirement for net interest rate risk. See also chapter 5.

2.1 Foreign exchange risk

The parent company assumes foreign exchange risk through its ownership in foreign subsidiaries. The ownerships are considered long term and the Firm do not hedge foreign exchange risk releated to the ownerships. Revenues and costs are in EUR, GBP, NOK, SEK, SGD and USD and same currency is matched at company level before currency conversion takes place when they fall due. The Firm also assumes foreign exchange risk if financial transactions in foreign currency is not settled. This risk is mitigated by the DVP principle and is negligible in terms of capital. Structural foreign exchange risk is low and the Firm`s Pillar 2 capital requirement for foreign exchange risk is not higher than the capital requirement calculated under Pillar 1.

3. Operational risk

Operational risk refer to the risk of loss on the part of the Firm related to inadequate or failed internal processes, staff, systems, external events as well as legal risk. The definition of operational risk includes legal and regulatory risk. Legal and regulatory risk includes, but is not limited to, penalties, or punitive damages resulting from supervisory actions, as well as private settlements. The interpretation, scope and validity of the legal framework governing the supervised entity's operations entail uncertainties that may give rise to significant losses and have a bearing on the entity's legal responsibility and possible liability for indemnification.

Operational risk is mitigated and controlled through appropriate internal systems and internal controls (including an annual self-assesesment of operational risk), instructions and procedures for the Firm, employee training, self-assessment, quality assurance and reporting. The distribution of responsibilities makes line managers and employees responsible for identifying, quantifying and preventing operational risk on a daily basis. Identified incidents are reported on an ongoing basis, analysed and if necessary, new measures are implemented in internal controls, instructions or procedures. The follow-up and control of operational risk falls under the auspices of the risk function and the compliance function which are controlled by internal audit. See also section 7.1.

Operational risk is the Firm's biggest risk, and legal and compliance risk related to corporate finance services is the single largest operational risk. Consequently, the capital requirement for operational risk is relatively higher than for other risk types. Historical losses on operational risk are low and have never affected the capital adequacy. The Pillar 2 capital requirement is regarded to be at the same level as the Pillar 1 capital requirement.

4. Liquidity risk

Liquidity risk is defined as the risk of economic loss on the part of the Firm as a result of the Firm being unable to meet its ongoing payment obligations and/or to fund increases in its assets without incurring significant additional costs in the form of price reductions on such assets which needs to be realised or in the form of unusually expensive funding.

The Firm fund itself through operations and does not depend on external funding for liabilities recognised on its balance sheet. Surplus liquidity is maintained as liquid capital deposits with large Nordic banks and covered bonds and repos with low risk. Pareto Securities AB is engaged in borrowing and lending as part of its business activity securities financing transactions. The structural liquidiy risk is low as both the borrowing and the lending is short in terms of interest and maturity. The company is not dependent of external borrowing for funding purposes. The total interest rate exposure of the Firm is predominantly of a short-term nature.

Settlement of financial transaction may from time to time require extra liquidity but maturities are short. The Firm have liquidity drawing rights for the purpose of ensuring the settlement of financial transactions.

The Board of Directors has adopted special instructions and contingency plans with regard to liquidity risk, liquidity strategy and stresstesting. The main part of the liquidity risk is controlled daily and followed-up by operational departments according to internal instructions.

The liquidity risk is considered to be low. The Firm does not have additional Pillar 2 capital for liquidity risk but have in place liquidity reserves and drawing rights as cover for potential liquidity risks.

5. Concentration risk

Concentration risk is exposure that may arise within or across different risk categories in the company/group with the potential result of (i) losses that are large enough to threaten the company's/group's ability to maintain its core operations, or (ii) materially alter the risk profile.

Concentration risk is primary identified within credit risk, market risk, operational risk and commercial risk. The concentration risk is handled by daily controls, limits and diversification. It is not identified a Pillar 2 capital requirement for concentration risk.

6. Ownership risk

Ownership risk is defined as the risk that the Firm incurs losses from ownership stakes in strategically held companies and/or the need to contribute new equity to such companies.

Subsidiaries are organised in compliance with the provisions of each countries laws and regulations. The most important controls of ownership risk are through board representation, capital planning, capital allocation, risk reporting and monitoring. In a number of the companies, group directors are involved in the daily operations through outsourcing of functions. Ownership risk in subsidiaries primarily takes the form of underlying operational risk by way of covering any losses.

Pareto Securities AS may from time to time transfer capital to subsidiaries for the purpose of strengthen own funds due to shortfall of revenues and net earnings. The capital transfers are small relative to Pareto Securities AS revenues and profit, and do not drain the Firm's own funds.

An overview of subsidiaries and capital is provided in Chapter 3.

The ownership risk is considered to be low and the Firm has not identified a Pillar 2 capital requirement for ownership risk.

7. Systemic risk

Systemic risk is the possibility that an event trigger severe instability or collapse of a significant portion to the financial system which have a significant negative effect on an entire industry or economy. The Firm does not fund itself externally, has minimal direct exposure to the private housing market and low exposure to the derivatives markets in terms of increased margins and impairment of assets. Liquidity is diversified in short term placings such as covered bonds and repos, and with the largest well capitalised Nordic banks in countries with very good public finances. Liquidity can easily be re-allocated to more secure placings if required.

The systemic risk is considered to be low and the Firm has not identified a Pillar 2 capital requirement for systemic risk.

8. Commercial risk, including reputational risk

Commercial risk is defined as the risk of unexpected revenue and cost fluctuations in the operations over the coming year, as the result of changes in external factors like the business cycle or client behaviour, i.e. other factors than credit risk, market risk and operational risk. Reputational risk is included in commercial risk.

Unexpected shortfalls in earnings may be caused by competition factors that result in lower sales, pressure on prices, severe economic downturn in important markets, government regulations or negative media coverage. Losses may be realised if the Firm does not adapt its costs to compensate for any shortfall in revenues or unexpected costs. Strategic planning, on-hand follow-up of revenues and costs, as well as a low cost based and cost control, are the most important tools for reducing commercial risk. The Firm is highly diversified in terms of revenue sources through a broad product range, industry sectors, clients and geography. The Firm is flexible and may swiftly adapted to changes in market conditions.

The Firm believes that one of the greatest risks it faces comes from the potential loss of its reputation. Therefore the Firm strives to maintain a good relationship with its clients by long term thinking and to demonstrate the highest level of integrity in all of its activities.

The commercial risk is considered prudent managed and the Firm has over a long time proven its abilities to generate revenues and profit, even during periods with severe economic downturn over several years. The Firm does not hold Pillar 2 capital for commercial risk.

8. Remuneration

The Firm's remuneration policy complies with chapter 15 of Regulations of 9 December 2016 regarding financial institutions which implements CRD IV requirements for a sound remuneration policy ('the Remuneration Regulations'). The requirements are intended to reduce excessive risk taking and promote sound and efficient management of risk and control of risk-taking behaviour by individuals in financial institutions. The regulation applies to all financial institutions, regardless of the individual firm's size and complexity.

The intentions behind the company's remuneration arrangements are to attract and retain skilled and highly qualified personnel, as well as to provide incentive arrangements focused on promoting a long-term perspective, responsibility and effective and sound risk management, not encouraging excessive risk taking and obtaining a sound balance between fixed and variable remuneration. The arrangements do not curtail the scope of the company for maintaining adequate own funds or, if necessary, to expand such funds.

The Board of Directors decides (i) the total amount to be paid in variable remuneration in respect of each financial year, (ii) the remuneration of senior executives and executives with overall responsibility for control functions, as well as (iii) measures to follow up the implementation of the remuneration arrangements.

All employees receive a fixed remuneration at a reasonable level and may in additional receive a discretionary remuneration. The discretionary remuneration is determined in view of the earnings of the Firm as a whole and the earnings of the relevant business unit, as well as whether the employee has brought in considerable new business or clients, engaged in external or internal activities of special value to the company or otherwise performed extraordinarily well, assumed major client/personnel responsibilities etc.

The remuneration arrangements differ between employees who are assumed to influence company risk ("risk takers" and other "special employees") and employees who are expected to have no or little potential impact on company risk. The risk takers may not receive a bonus in excess of 200 per cent of their fixed salary and the bonus will be distributed over a three year time period.

Assessments are conducted to identify which employees can be considered «risk takers» or «special employees» (categories: senior executives, employees of material importance to the company's risk exposure, other employees with corresponding remuneration, as well as senior officers in control functions). The classification of employees into the above categories is based on the provisions of the Remuneration Regulations.

Chief Executive Officer, Head of Project Finance, Head of Corporate Finance, Head of Equity Sales and Head of Fixed Income Sales, are identified as senior executives and significant risk takers. The Chief Financial Officer, Head of Compliance and Head of Risk Management are identified as senior employees with control duties. No other «risk takers» or other «special employees» have been identified.

The remuneration to the Chairperson of the Board of Directors is TNOK 360. Members of the Board, employed in the Pareto Group do not receive remuneration for their services as board members. Paid remuneration to the Chief Executive Officer in 2016 was TNOK 13 720, consisting of fixed remuneration for 2016, 50 % of variable remuneration for the year 2015 and paid out contingent remuneration from 2014, 2013 and 2012. The CEO owns 3.75 % of the shares in Pareto Securities AS through Nes Invest AS.

For 2016, special employees have received fixed work remuneration in the total amount of TNOK 29,520, with TNOK 24,120 being paid to senior executives and TNOK 5,400 being paid to employees with control duties.

Variable remuneration for special employees is divided into a cash portion of 50 % and a contingent capital portion of 50%. The contingent capital is retained by the company in the form of a subordinated loan bearing market interest rate. The contingent capital is risk-adjusted annually and paid out over a three-year period. The contingent capital shall be reduced if thus merited by either the subsequent earnings of the Firm or subsequent performance.

Variable remuneration divided into a cash portion of 50 % and a contingent capital portion of 50 % is in accordance with the Remuneration Regulations and determined by the Board of Directors. The aggregated variable remuneration to the «risk takers» or «special employees» amounted to TNOK 10,524 for the year 2016. Variable remuneration was TNOK 8,492 for senior executives and TNOK 2,032 for senior employees with control duties.

APPENDIX A

The own funds and capital adequacy for subsidiaries as per 31 December 2016:

Pursuant to the European Parliament and Councils Directive 2013/36/EU of June 26 2013 ('CRD IV') and the European Parliament and Councils Regulation (EU) no 575/2013 of June 26 2013 and amending Regulation (EU) no 648/2012 ('CRR').

Company	**Pareto Securities Ltd**	**Pareto Securities Inc ***	**Pareto Securities Pte Ltd ****	**Pareto Securities AB**	**Pareto Securities Oy**	**Pareto Securities Pty Ltd**	**Pareto Alternative Investment AS**
Amounts in thousands	***GBP***	***USD***	***SGD***	***SEK***	***EUR***	***AUD***	***NOK***
Paid-up capital instruments	3 077	360	4 000	70 594	730	2 700	60
Share premium	65	2 044	0	0	0	0	3 422
Own CET1 instruments	0	0	0	0	0	0	0
Previous years retained earnings	146	1 961	467	91 623		-2 019	518
Interim loss	-226	-1 703	-2 015	0	0	-413	0
Other reserves	59	0	0	7550	770	0	0
Value adjustments	0	0	0	- 812	0	0	0
Deferred tax benefit	0	0	0	0	0	0	0
Intellectual property	0	0	0	-2886	-6	0	0
Tier 1 capital (CET1)	**3 121**	**2 662**	**2 452**	**166 069**	**1 494**	**268**	**4 000**
Tier 2 capital	0	3 918	0	0	0	0	0
Own funds	**3 121**	**6 580**	**2 452**	**166 069**	**1 494**	**268**	**4 000**
Total risk weighted exposure amount	**9 575**	**N/A**	**6 675**	**803 058**	**9 019**	**N/A**	**28 425**
Capital Adequacy - Ratios							
CET1 Capital ratio	32,6%	85,2%	36,7%	20,7%	16,6%	N/A	14,1%
T1 Capital ratio	32,6%	85,2%	36,7%	20,7%	16,6%	N/A	14,1%
Total capital ratio	32,6%	210,6%	36,7%	20,7%	16,6%	N/A	14,1%
Risk weighted exposure amount							
Credit risk	895	N/A	0	131 808	1 130	N/A	25 632
Settlement risk	0	N/A	0	0	0	N/A	0
Market risk	0	N/A	0	83 846	0	N/A	0
Foreign Exchange risk	2 049	N/A	0	10 059	0	N/A	0
CVA risk	0	N/A	0	270	0	N/A	0
Operational risk/ fixed costs	6 631	N/A	6 675	577 075	7 889	N/A	2 793
Total risk weighted exposure amount	**9 575**	**N/A**	**6 675**	**803 058**	**9 019**	**N/A**	**28 425**
Capital requirement							
Credit risk	72	N/A	0	10 545	90	N/A	2 051
Settlement risk	0	N/A	0	0	0	N/A	0
Market risk	0	N/A	0	6 708	0	N/A	0
Foreign Exchange risk	164	N/A	0	805	0	N/A	0
CVA risk	0	N/A	0	22	0	N/A	0
Operational risk	530	N/A	534	46 166	631	N/A	223
Total minimum capital requirement	**766**	**250**	**534**	**64 245**	**722**	**N/A**	**2 274**
Risk weighted exposure amount per exposure class creditrisk							
Institutions	618	N/A	0	85 104	685	N/A	2 743
Corporates	62	N/A	0	4 243	0	N/A	16 935
Retail	0	N/A	0	22 358	0	N/A	0
Other items	215	N/A	0	20 103	445	N/A	5 954
Total risk weighted exposure amount	**895**	**N/A**	**0**	**131 808**	**1 130**	**N/A**	**25 632**
Process for assessing the overall capital requirement							
	ICAAP	**N/A**	**N/A**	**ICAAP**	**ICAAP**	**N/A**	**ICAAP**

**Capital requirement pursuant to Rule 15c3-1 of the Securities and Exchange Commission.*

***Capital requirement pursuant to Chapter 289, Regulations 27(3)(b) and (9)(e) of the Securities and Futures Act.*