

In case of discrepancies between the French and the English text, the French text shall prevail.

Luxembourg, 7 April 2015

To credit institutions and Luxembourg  
branches of credit institutions having their  
registered office in a third country

**CIRCULAR CSSF 15/610**

**Re: Ad hoc data collection within the context of Directive 2014/59/EU<sup>1</sup>  
("Banking Recovery and Resolution Directive", in abbreviated form "BRRD")**

Ladies and Gentlemen,

1. This circular aims at requesting information from credit institutions, as well as Luxembourg branches of credit institutions having their registered office in a third country, with a view to preparing the CSSF's work as future resolution authority under the BRRD, for the purposes of:
  - drawing up resolution plans in accordance with Articles 10 and 12 of the BRRD;
  - calculating the minimum requirement for own funds and eligible liabilities ("MREL") in accordance with Article 45 of the BRRD.

It is important to note that requests for information will be made, on a regular basis, in the future, as resolution plans must be updated on a regular basis.

2. In practical terms, the circular relates to the following two points which will be explained further:
  - a) Information to be provided to draw up resolution plans;
  - b) Information relating to eligible liabilities for calculating the minimum requirement for own funds and eligible liabilities ("MREL").

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<sup>1</sup> Directive 2014/59/EU of the European Parliament and of the Council of 15 May 2014 establishing a framework for the recovery and resolution of credit institutions and investment firms and amending Council Directive 82/891/EEC, and Directives 2001/24/EC, 2002/47/EC, 2004/25/EC, 2005/56/EC, 2007/36/EC, 2011/35/EU, 2012/30/EU and 2013/36/EU, and Regulations (EU) No 1093/2010 and (EU) No 648/2012, of the European Parliament and of the Council ("**BRRD**") (<http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32014L0059&from=EN>)

3. The following specifications should be read in conjunction with the provisions of the BRRD. The instructions set out therein are without prejudice to the transposition into Luxembourg law of the BRRD as well as the secondary legislation or the guidelines of the European Banking Authority (the "EBA") relating thereto.
4. Articles 10 and 12 of the BRRD require that the resolution authorities draw up resolution plans and/or group resolution plans, respectively, setting out possible resolution measures. The resolution plans are to be drawn up based on the information to be provided pursuant to Article 11 of the BRRD. Said Article 11 provides for the preparation by the EBA of the draft implementing technical standards specifying standardised forms and templates. These draft implementing technical standards are currently the subject of a public consultation until 14 April 2015.<sup>2</sup> Based thereon, the CSSF decided to already undertake a data collection even if it does not expect significant changes after the consultation. To this end, credit institutions as well branches of credit institutions having their registered office in a third country, are required to fill in the following tables in Annexes I to XII based on the situation and the figures available as at 31 December 2014:
  - I) Organisational structure;
  - II) Governance and management;
  - III) Critical functions and core business lines;
  - IV) Critical counterparties;
  - V) Liabilities structure;
  - VI) Funding sources;
  - VII) Off-balance sheet;
  - VIII) Payment systems;
  - IX) Information systems;
  - X) Interconnectedness;
  - XI) Authorities;
  - XII) Legal impacts of resolution.

The definitions and explanations required to properly fill in the tables are provided for in Annexe XIII in the document entitled "Instructions to fill in Annexes I to XII".

5. Article 45(1) of the BRRD provides that credit institutions must permanently comply with the minimum requirement for own funds and eligible liabilities (MREL). The MREL is calculated as the amount of own funds and eligible liabilities expressed as a percentage of the total liabilities and own funds of the institution. According to Article 2(1)(71) of the BRRD, the eligible liabilities are liabilities or liability items and capital instruments which are not Common Equity Tier 1 instruments, Additional Tier 1 or 2 instruments of an institution or an entity referred to in Article 1(1), point b), c) or d), which are not excluded from the scope of application of the bail-in tool in accordance with Article 44(2) of the BRRD.

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<sup>2</sup> <http://www.eba.europa.eu/regulation-and-policy/recovery-and-resolution/implementing-technical-standards-on-procedures-forms-and-templates-for-resolution-planning>

6. Article 44(2) lists all exclusions. They concern, inter alia, the deposits covered by the deposit guarantee scheme, secured liabilities (including covered bonds), liabilities to institutions (excluding entities that are part of the same group) with an original maturity of less than seven days, claims of tax and social security administrations, or certain liabilities resulting from the holding of client assets or money<sup>3</sup>. Table V "Liabilities structure" attached hereto (to be filled in according to point 4 above) lists the eligible liabilities for each counterparty category.
  
7. For the purposes of calculating the MREL, the eligible liabilities may, however, not all be taken into account. Indeed, Article 45(4) of the BRRD specifies that eligible liabilities are included in the amount of own funds and eligible liabilities (= numerator of the ratio), only if they fulfil the following conditions:
  - a) the instrument is issued and fully paid up;
  - b) the liability is not owed to, secured by or guaranteed by the institution itself;
  - c) the purchase of the instrument was not funded directly or indirectly by the institution;
  - d) the liability has a remaining maturity of at least one year;
  - e) the liability does not arise from a derivative;

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<sup>3</sup> The following items are excluded in accordance with Article 44(2):

- (a) covered deposits;
- (b) secured liabilities including covered bonds and liabilities in the form of financial instruments used for hedging purposes which form an integral part of the cover pool and which according to national law are secured in a way similar to covered bonds;
- (c) any liability that arises by virtue of the holding by the institution or entity of client assets or client money including client assets or client money held on behalf of UCITS as defined in Article 1(2) of Directive 2009/65/EC or of AIFs as defined in point (a) of Article 4(1) of Directive 2011/61/EU of the European Parliament and of the Council (1), provided that such a client is protected under the applicable insolvency law;
- (d) any liability that arises by virtue of a fiduciary relationship between the institution or entity (as fiduciary) and another person (as beneficiary) provided that such a client or beneficiary is protected under the applicable insolvency or civil law;
- (e) liabilities to institutions, excluding entities that are part of the same group, with an original maturity of less than seven days;
- (f) liabilities with a remaining maturity of less than seven days, owed to systems or operators of systems designated according to Directive 98/26/EC or their participants and arising from the participation in such a system;
- (g) a liability to any one of the following: an employee, in relation to accrued salary, pension benefits or other fixed remuneration, except for the variable component of remuneration that is not regulated by a collective bargaining agreement (this point shall not apply to the variable component of the remuneration of material risk takers as defined in Article 92(2) of Directive 2013/36/EU); a commercial or trade creditor arising from the provision to the institution or entity of goods or services that are critical to the daily functioning of its operations, including IT services, utilities and the rental, servicing and upkeep of premises; tax and social security authorities, provided that those liabilities are preferred under the applicable law; national deposit guarantee schemes arising from contributions due in accordance with Directive 2014/49/EU.

- f) the liability does not arise from a deposit which benefits from preference in the national insolvency hierarchy in accordance with Article 108 of the BRRD.

For the purpose of point (d) where a liability confers upon its owner a right to early reimbursement, the maturity of that liability shall be the first date where such a right arises.

Moreover, in accordance with Article 45(5) of the BRRD, where a liability is governed by the law of a third country, resolution authorities may require the institution to demonstrate that any decision of a resolution authority to write down or convert that liability would be effective under the law of that third country, having regard to the terms of the contract governing the liability, international agreements on the recognition of resolution proceedings and other relevant matters. If the resolution authority is not satisfied that any decision would be effective under the law of that third country, the liability shall not be counted towards the minimum requirement for own funds and eligible liabilities.

Consequently, the CSSF requires the relevant entities to provide it with a collection of all their eligible liabilities which comply with the conditions laid down in points a) to f) above, by differentiating between their remaining maturity and by indicating whether they are governed by the laws of a third country, and where appropriate, which country it is, by filling in the table in Annexe XIV, based on the situation and the figures available on 31 December 2014. The following tables are to be filled in: a table for the liabilities governed by the laws of EU Member States, and a table by third country for the liabilities governed by the laws of a third country.

8. The tables to be provided for the purposes of collecting information for the drawing-up of resolution plans and for the calculation of the MREL as well as the instructions relating to the first set of tables attached hereto. The tables are available electronically on our website at: [www.cssf.lu/fileadmin/files/ESPREP-Xxxxx-yyyy-mm-BRR.xls](http://www.cssf.lu/fileadmin/files/ESPREP-Xxxxx-yyyy-mm-BRR.xls). The name of the file must comply with the file naming convention for special enquiries as defined in Circular CSSF 08/344, using the following file name for the survey under review:
- “yyyy-mm” refers to the period to which the data relate,
  - the letter “X” must be replaced by the letter “B” , and
  - “xxxx” corresponds to the identification number of the institution with the CSSF.

Example: ESPREP-B0999-2014-12-BRR.xls

Once the file has been completed, it must be transmitted through one of the secured channels (E-File or SOFiE).

The relevant file must be in “.xls” or “.xlsx”. Any other format (for example, “.doc”, “.pdf”, etc.) will not be accepted. The required information shall be reported to the CSSF by **30 May 2015** at the latest.

Given the importance of the data collection for the CSSF's work in respect of resolution, it is crucial that a member of the management of the institution approves the files before sending them.

For any query in connection with this circular, please contact Mrs. Joëlle Martiny (e-mail: [joelle.martiny@cssf.lu](mailto:joelle.martiny@cssf.lu)).

Yours faithfully,

COMMISSION de SURVEILLANCE du SECTEUR FINANCIER

Andrée BILLON	Simone DELCOURT	Jean GUILL
Director	Director	Director General

Annexes

**Annex I - Organisational structure**

Legal Entity		Direct Holder		Capital	Voting rights	Consolidating entity	
Entity name	Legal identifier	Entity name	Legal identifier			Entity name	Legal identifier
010	020	030	040	050	060	070	080
<i>Holding company X</i>	<i>110</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>	<i>NA</i>
<i>Bank A (Parent)</i>	<i>111</i>	<i>Holding company X</i>	<i>110</i>	<i>100%</i>	<i>100%</i>	<i>Bank A</i>	<i>111</i>
<i>Bank B (Subsidiary)</i>	<i>112</i>	<i>Bank A</i>	<i>111</i>	<i>80%</i>	<i>60%</i>	<i>Bank A</i>	<i>111</i>
<i>Bank U</i>	<i>156</i>	<i>Bank B</i>	<i>112</i>	<i>100%</i>	<i>100%</i>	<i>Bank A</i>	<i>111</i>

Annex II - Governance and management

Legal Entity		Location	Jurisdiction of incorporation	Licensing Authority	Type of Licence	Member of the management body responsible for providing the information for the resolution plan			Key manager			
Entity name	Legal identifier					Name	Phone number	e-mail address	Name	Function	Phone number	e-mail address
010	020	030	040	050	060	070	080	090	100	110	120	130
Bank A	111	London	GB	BoE	Deposit taking	David Jones	4444444	<a href="mailto:djones@banka.com">djones@banka.com</a>				
Bank B	112	Paris	FR	ACP	Deposit taking, asset management	Paul Durand	33333333	<a href="mailto:pdurand@bankb.com">pdurand@bankb.com</a>				

Annex III - Critical functions and core business lines

Critical functions 010	Core business line 020	Legal entity		Location 050	Material assets 060	Material liabilities 070	Senior management official responsible for providing information		
		Entity name 030	Legal identifier 040				Name 080	Telephone number 090	e-mail address 100
Deposit taking Asset management		Bank A Bank B	111 112	London Paris	1 billion assets under management	5 billion deposits			



Annex IV, Section 1 - Critical Counterparties (Assets)

Legal Entity		Counterparty		Gross Exposure	Guarantees	Impairment & provisions	Net Exposure	Impact on CET1	Comments
Entity name	Legal Identifier	Entity name	Legal Identifier						
010	020	030	040	050	060	070	080	090	100
Bank A		111 UK government	789	200,000	0	0	200,000	200 bp	
Bank B		112 Bank W	444	1,000,000	500,000	200,000	300,000	300 bp	
Bank A		111 Corporate U	650	500,000	0	400,000	100,000	100 bp	

**Annex IV, Section 2 - Critical Counterparties (Liabilities)**

Legal Entity		Counterparty		Funding		Comments
Entity name	Legal Identifier	Entity name	Legal Identifier	Type	Amount	
010	020	030	040	050	060	



**Annex VI - Funding sources**

Legal Entity		Issuer of collateral		Type of collateral	Identification number	Holder of collateral		Amount	Currency	Jurisdiction
Name	LEI	Name	LEI			Name	LEI			
010	020	030	040	050	060	070	080	090	100	110
<i>Bank A</i>		<i>111 US government</i>		<i>278 US gov bonds</i>		<i>Bank L</i>	<i>487</i>	<i>1000</i>	<i>USD</i>	<i>US</i>
<i>Bank A</i>		<i>111 Bank A</i>		<i>997 Mortgages</i>		<i>BoE</i>	<i>997</i>	<i>1000</i>	<i>GBP</i>	<i>GB</i>

Annex VII - Off-balance sheet

Legal Entity		Off balance sheet item	Counterparty		Amount	Currency	Critical operations	Core business lines	Comments
Entity name	Legal Identifier		Entity name	Legal identifier					
010	020	030	040	050	060	070	080	090	100
Bank A		111 credit line	Bank C	113	10 000 000	GBP			agreement expiring end 2015
Bank A		111 credit line	Bank D	114	-5,000,000	EUR			agreement expiring end 2015

Annex VIII , Section 1- Payment system (Membership)

Legal entity		System				Representative Institution		Mapping to Critical function	Mapping to Core Business line	Membership requirements	Impact of resolution proceedings on membership	Substitutability	Additional information
Entity name 010	Legal identifier 020	System type 030	Designation 040	Participation mode 050	Identification code 060	Entity name 070	Identification code 080	090	100	110	120	130	140
<i>Bank A</i>	<i>111</i>	<i>Central securities depository</i>	<i>Clearstream</i>	<i>indirect</i>		<i>Bank W</i>			<i>Securities trading</i>		<i>Membership cancelled</i>	<i>Euroclear</i>	
<i>Bank B</i>	<i>112</i>	<i>Payment system</i>	<i>TARGET</i>	<i>direct</i>				<i>Payment</i>					

**Annex VIII, Section 2 - Payment systems (Correspondent banking)**

Legal entity		Correspondent identification		Account access	Payment system	Currency	Users with authorization to operate the account	Outcome of the contract in case of resolution	Comments
Entity name	Legal identifier	Entity name	Legal identifier						
010	020	030	040	050	060	070	080	090	100
<i>Bank B</i>	<i>112</i>	<i>Bank X</i>	<i>849</i>	<i>SWIFT</i>	<i>Fedwire</i>	<i>USD</i>	<i>John Smith</i>	<i>maintained</i>	<i>Operations above xxx€ must be authorized by another user.</i>

**Annex IX, Section 1 - Information systems (General information)**

System		Owner		Business Responsible			Operational Responsible		
Identification	Type	Entity name	Legal identifier	Name	Email	Telephone	Name	Email	Telephone
010	020	030	040	050	060	070	080	090	100
System A	other	Bank A	111						
System B	risk management	Bank A	111						
System C	accounting	Bank A	111						



**Annex IX, Section 2 - Information systems (Contractual information)**

System	Type of contract	Counterparty		Description	Outcome of the contract in case of resolution
		Entity name	Legal identifier		
010	020	030	040	050	060
<i>System A</i>	<i>License</i>	<i>Entity A</i>		<i>License of database software</i>	<i>License revoked</i>
<i>System A</i>	<i>License</i>	<i>Entity B</i>		<i>Maintenance of back-end</i>	<i>None</i>
<i>System B</i>	<i>SLA</i>	<i>Entity C</i>		<i>SLA for having 99% availability</i>	<i>None</i>

**Annex IX, Section 3 - Information systems (Mapping)**

System	User			
	Entity name	Legal identifier	Critical Function	Core Business Line
010	020	030	040	050
<i>System A</i>	<i>Bank A</i>	<i>111</i>	<i>Deposit taking</i>	<i>Deposit taking</i>
<i>System A</i>	<i>Bank B</i>	<i>112</i>	<i>Deposit taking</i>	<i>Deposit taking</i>
<i>System B</i>	<i>Bank A</i>	<i>111</i>	<i>Credit</i>	<i>Retail</i>
<i>System B</i>	<i>Bank C</i>	<i>113</i>	<i>Credit</i>	<i>Corporate banking</i>
<i>System C</i>	<i>Bank A</i>	<i>111</i>	<i>All</i>	<i>All</i>

**Annex X -Interconnectedness**

Legal entity A		Legal Entity B		Type of interconnectedness	Description
Entity name	Legal identifier	Entity name2	Legal identifier2		
010	020	030	040	050	060
Bank A	101	Bank B	102	Personnel	Legal staff (40 elements)
Bank A	101	Bank C	103	Personnel	Legal staff (40 elements)
Bank B	102	Bank C	103	Systems	All systems and IT infrastructures used by Bank C are also used by Bank B
Bank A	101	Bank C	103	Funding arrangements	The funding of Bank C is done through Bank A
Bank A	101	Entity D	104	Personnel	Legal staff (40 elements)
Bank A	101	Bank B	102	Funding arrangements	The funding of Bank B is done through Bank A
Bank C	103	Entity D	104	Facilities	The headquarters of Bank C and Entity D are on the same building
Bank A	101	Bank B	102	Liquidity arrangements	Bank A agrees to provide liquidity to Bank B when necessary
Entity D	104	Bank A	101	Personnel	All IT personnel of Bank A is from Entity D

Annex XI - Authorities

Legal Entity		Supervisory Authority/ies		Resolution Authority		Deposit Guarantee Authority	
Entity Name	Legal identifier	Name	Contact details	Name	Contact details	Name	Contact details
010	020	030	040	050	060	070	080
<i>Bank A</i>		<i>111 Prudential Regulation Authority</i>		<i>Bank of England</i>		<i>Financial Services Compensation Scheme</i>	

Annex XII - Legal impacts of resolution

Legal entity		Third party		Type of contract	Termination affecting resolution tool	Comments
Name	Legal identifier	Name	Legal identifier			
010	020	030	040	050	060	070
<i>Bank B</i>	<i>112</i>	<i>Euronext NV</i>		<i>Membership</i>	<i>Y</i>	<i>Sale of asset management activity possibly difficult in case of resolution</i>

## **Instructions to fill-in Annexes I to XII**

### **General instructions**

#### 1. Structure and convention

##### 1.1 Structure

The framework consists of twelve sets of templates which comprise a total of XX templates according to the following scheme:

1. Organisational structure
2. Governance and management
3. Critical functions and core business lines
4. Critical counterparties (2 templates)
5. Liabilities structure
6. Funding sources
7. Off-balance sheet
8. Payment systems (2 templates)
9. Information systems (3 templates)
10. Interconnectedness
11. Authorities
12. Legal impacts of resolution

##### 1.2 Accounting standard

Institutions shall report carrying amounts under the accounting framework they use for the reporting of financial information. Institutions that are not required to report financial information shall use their respective accounting framework

For the purpose of this Annex, “IAS” and “IFRS” refer to the international accounting standards as defined in Article 2 of Regulation (EC) N) 1606/2002.

##### 1.3 Numbering convention

The following general notation is used in these instructions to refer to the columns, rows and cells of a template: {Template; Row; Column}.

##### 1.4 Level of application

The level of application is determined by resolution authorities when formulating their request, either directly or indirectly, to institutions.

### **Template related instructions**

#### 2. Annex I - Organisational structure

The following items of Section B of BRRD Annex are covered by this template:

*(1) Detailed description of the institution's organisational structure including a list of all legal entities*

(2) *Identification of the direct holder and the percentage of voting and non-voting right of each legal entity*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	<b>Direct holder</b>
030	<b>Name</b> Name of the Entity holding a direct participation and controlling the legal entity identified in column 010
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 030. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	<b>Capital (%)</b> Percentage of capital held by the legal entity listed in column 030 in the legal entity listed in column 010
060	<b>Voting rights (%)</b> Percentage of voting rights held by the legal entity listed in column 030 in the legal entity listed in column 010
070-080	<b>Consolidating entity</b>
070	<b>Entity name</b> Name of the entity consolidating the entity listed in column 010 at the highest level according to Regulation (EU) n° 575/2013
080	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 070. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.

### 3. Annex II - Governance and management

The following items of Section B of BRRD Annex are covered by this template:

(3) *The Location, jurisdiction of incorporation, licensing and key management associated with each legal entity*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030	<b>Location</b>

	City where the entity listed in Column 10 is legally registered.
040	<b>Jurisdiction of incorporation</b> Jurisdiction where the entity listed in Column 010 is incorporated, identified according to ISO 3166
050	Licensing Authority Name of the authority providing banking or investment firm license to the institution listed in Column 10
060	Type of license
070-090	Member of the management body responsible for providing the information on the resolution plan
070	Name First Name, Last name
080	Phone number
090	e-mail address
100-130	Key manager
100	Name First name, Last name
110	Function
120	Phone number
130	e-mail address

#### 4. Annex III - Critical functions and core business lines

The following items of Section B of BRRD Annex are covered by this template:  
*(4) a mapping of the institution's critical operations and core business lines including material asset holdings and liabilities related to such operations and business lines, by reference to legal entities*  
*(17) The senior management official responsible for the resolution plan of the institution as well as those responsible, if different, for the different legal entities, critical operations and core business lines*

#### Instructions concerning specific columns

Columns	Legal reference and instructions
010	<b>Critical functions</b> Means “critical functions” pursuant to Articles 2(1)(35) and 2(2) of Directive 2014/59/EU.
020	<b>Core business lines</b> Means “core business lines” pursuant to Articles 2(1)(36) and 2(2) of Directive 2014/59/EU.
030-040	Legal entity
030	Entity name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	<b>Location</b> Geographies (City) in which the business lines operates
060-070	Material assets
060	Type
070	<b>Amount</b> In Million
080-090	Material liabilities



080	Type
090	Amount In Million
100-130	Senior management official responsible for providing information
100	<b>Name</b> First name, Last name
110	Function
120	Telephone number
130	E-mail address

5. Annex IV, Section 1 - Critical counterparties (Assets)

The following items of section B of BRRD Annex are covered by this template:  
*(10) Identification of the major or most critical counterparties of the institution as well as an analysis of the impact of the failure of major counterparties in the institution's financial situation*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	Counterparty
030	Name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	Gross Exposure
060	Guarantees
070	<b>Impairments / Provisions</b>
080	<b>Net Exposure</b> 080 = 050 – 060 - 070
090	<b>Impact on CET1 ratio</b> Impact of a default of the counterparty listed in column 030 on the Core Equity Tier 1 ratio of the legal entity listed in column 010
100	Comments

6. Annex IV, Section 2 - Critical counterparties (Liabilities)

The following items of section B of BRRD Annex are covered by this template:  
*(10) Identification of the major or most critical counterparties of the institution as well as an analysis of the impact of the failure of major counterparties in the institution's financial situation*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name

020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	Counterparty
030	Entity name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050-060	Funding
050	Type
060	Amount
070	Comments

#### 7. Annex V - Liabilities structure

The following items of Section B of BRRD Annex are covered by this template:

*(5) a detailed description of the components of the institution's and all its legal entities' liabilities, separating, at a minimum by types and amounts of short term and long-term debt, secured, unsecured and subordinated liabilities*

*(6) detail of those liabilities of the institution that are eligible liabilities*

Instructions concerning specific rows

Rows	Legal reference and instructions
010	Legal entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030	<b>Governing law of the liabilities</b> EU or Third Country
040	Date
050	Natural persons
055	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
060	Micro, small and medium-sized enterprises
065	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
070	Large non-financial enterprises
075	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
080	Banks
085	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
090	Insurance undertakings, reinsurance undertakings firms and pension and retirement funds
095	<i>Of which eligible liabilities</i>

	Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
100	Other financials undertakings
105	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
110	<b>Intragroup</b> Exposures towards entities within the same group. Such exposures shall be listed in that row only to avoid double counting (e.g. exposures towards a bank belonging to the same group should be identified in row 110 and not in row 080 on ‘banks’)
115	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
120	Others
125	<i>Of which eligible liabilities</i> Amount of liabilities that are “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.
130	Total
140	<b>Total eligible liabilities</b> Total of “eligible liabilities” pursuant to Article 2(71) of Directive 2014/59/EU.

#### Instructions concerning specific columns

Columns	Legal reference and instructions
010-030	Debt with a legal subordination qualifying as additional tier 1
010	Remaining maturity of less than a month
020	Remaining maturity of less than a year
030	Remaining maturity of more than a year
040-060	Debt with a legal subordination qualifying as tier 2
040	Remaining maturity of less than a month
050	Remaining maturity of less than a year
060	Remaining maturity of more than a year
070-090	<b>Debt with a legal subordination</b>
070	<b>Remaining maturity of less than a month</b> Subordinated debt which does not qualify as tier 1 or tier 2
080	<b>Remaining maturity of less than a year</b> Subordinated debt which does not qualify as tier 1 or tier 2
090	<b>Remaining maturity of more than a year</b> Subordinated debt which does not qualify as tier 1 or tier 2
100-120	Senior unsecured debt
100	Remaining maturity of less than a month
110	Remaining maturity of less than a year
120	Remaining maturity of more than a year
130-150	Deposits
130	Total
140	<i>Of which Eligible deposits</i>
150	<i>Of which Covered deposits</i> Excluded from the scope of bail-in by article 44(2)(a)
160	<b>Secured debt</b> Excluded from the scope of bail-in by article 44(2)(b)
170	<b>Other liabilities excluded by article 44(2) of BRRD</b> Excluded from the scope of bail-in by articles 44(2)(c) to 44(2)(g)

8. Annex VI - Funding sources

The following items of Section B of BRRD Annex are covered by this template:  
 (7) *an identification of the processes needed to determine to whom the institution has pledged collateral, the person that holds the collateral and the jurisdiction in which the collateral is located*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	Issuer of collateral
030	Name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	Type of collateral
060	<b>Identification number</b> ISIN code
070-080	Holder of collateral
070	Name
080	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
090	Amount
100	<b>Currency</b> Identification according to ISO 4217
110	<b>Jurisdiction</b> Law of the jurisdiction governing the operation, identified according to ISO 3166

9. Annex VII - Off-balance sheet

The following items of Section B of BRRD Annex are covered by this template:  
 (8) *A description of the off balance sheet exposures of the institution and its legal entities, including a mapping to its critical operations and core business lines*  
 (9) *the material hedges of an institution including a mapping to legal persons*  
 (21) *information on off-balance sheet activities, hedging strategies*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Name
020	<b>Legal Identifier</b>

	20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030	<b>Off-balance sheet item</b> To be identified under the three following categories : guarantees, credit lines, others
040-050	Counterparty
040	Entity name
050	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
060	Amount
070	<b>Currency</b> Identification according to ISO 4217
080	Critical operations
090	Core business lines
100	Comments

#### 10. Annex VIII, Section 1 - Payment systems (Membership)

The following items of Section B of BRRD Annex are covered by this template:

*(11) each system on which the institution conducts a material number or value amount of trades, including a mapping to the institution's legal persons, critical operations and core business lines*

*(12) Each payment, clearing or settlement system of which the institution is directly or indirectly a member, including a mapping to the institution's legal persons, critical operations and core business lines*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-060	System
030	System type
040	Designation
050	<b>Participation mode</b> Direct or indirect
060	<b>Identification code</b> e.g. BIC, institution code, account number
070-080	Representative institution
070	Entity name
080	Identification code
090	Mapping to critical functions
100	Mapping to core business lines
110	Membership requirements
120	Impact of resolution proceedings on membership
130	<b>Substitutability</b> Name of potential other payment system provider that could substitute the payment

	system provider listed in column 010
140	Additional information

11. Annex VIII, Section 2 - Payment systems (Correspondent banking)

The following items of Section B of BRRD Annex are covered by this template:

*(11) each system on which the institution conducts a material number or value amount of trades, including a mapping to the institution's legal persons, critical operations and core business lines*

*(12) Each payment, clearing or settlement system of which the institution is directly or indirectly a member, including a mapping to the institution's legal persons, critical operations and core business lines*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Entity name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	Correspondent identification
030	Entity name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	<b>Account access</b> E.g. : home banking, Swift
060	Payment system
070	Currency
080	Users with the authorisation to operate the account
090	Outcome of the contract in case of resolution
100	Comments

12. Annex IX, Template 1 - Information systems (General information)

The following items of Section B of BRRD Annex are covered by this template:

*(13) a detailed inventory and description of the key management information systems, including those for risk management, accounting and financial reporting used by the institution including a mapping to the institution's legal persons, critical operations and core business lines*

*(14) an identification of the owners of the systems identified in point 13, SLA related thereto, and any software and systems or licenses, including a mapping to their legal entities, critical operations and core business lines*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	System
010	Identification
020	<b>Type</b> To be chosen between "risk management", "accounting", "financial reporting",

	"regulatory reporting" and "other"
030-040	Owner
030	Entity name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050-070	Business responsible
050	Name
060	E-mail
070	Telephone
080-100	Operational responsible
080	Name
090	E-mail
100	Telephone

### 13. Annex IX, Template 2 - Information systems (Contractual information)

The following items of Section B of BRRD Annex are covered by this template:

*(13) a detailed inventory and description of the key management information systems, including those for risk management, accounting and financial reporting used by the institution including a mapping to the institution's legal persons, critical operations and core business lines*

*(14) an identification of the owners of the systems identified in point 13, SLA related thereto, and any software and systems or licenses, including a mapping to their legal entities, critical operations and core business lines*

Instructions concerning specific columns

Columns	Legal reference and instructions
010	System
020	<b>Type of contract</b> License, Service Level Agreement (SLA), other
030-040	Counterparty
030	Entity name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	Description
060	Outcome of the contract in case of resolution

### 14. Annex IX, Template 3 - Information systems (Mapping)

The following items of Section B of BRRD Annex are covered by this template:

*(13) a detailed inventory and description of the key management information systems, including those for risk management, accounting and financial reporting used by the institution including a mapping to the institution's legal persons, critical operations and core business lines*

*(14) an identification of the owners of the systems identified in point 13, SLA related thereto, and any software and systems or licenses, including a mapping to their legal entities, critical operations and core business lines*

Instructions concerning specific columns

Columns	Legal reference and instructions
010	System
020-050	User
020	Entity name
030	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
040	<b>Critical functions</b> Means “critical functions” pursuant to Articles 2(1)(35) and 2(2) of Directive 2014/59/EU.
050	<b>Core business lines</b> Means “core business lines” pursuant to Articles 2(1)(36) and 2(2) of Directive 2014/59/EU.

15. Annex X - Interconnectedness

The following items of Section B of BRRD Annex are covered by this template:  
*(15) an identification and mapping of the legal persons and the interconnections and interdependencies among different legal persons such as:*

- common or shared personnel, facilities and systems
- capital, funding or liquidity arrangements
- existing or contingent credit exposure
- cross guarantee agreements, cross-collateral arrangements, cross-default provisions and cross-affiliate netting arrangements
- risk transfers and back-to-back trading arrangements, service level agreements

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	<b>Legal entity A</b>
010	<b>Entity name</b> Must be different from the name listed in column 030
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction. Must be different from the identifier listed in column 040
030-040	<b>Legal entity B</b>
030	<b>Entity name</b> Must be different from the name listed in column 010
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction. Must be different from the identifier listed in column 020
050	<b>Type of interconnectedness</b> To be chosen between the following categories: <ul style="list-style-type: none"> <li>- Personnel</li> <li>- Facilities</li> </ul>



	<ul style="list-style-type: none"> <li>- System</li> <li>- Capital arrangements</li> <li>- Funding arrangements</li> <li>- Liquidity arrangements</li> <li>- Credit exposure</li> <li>- Cross-guarantee agreement</li> <li>- Cross-collateral arrangement</li> <li>- Cross-default provision</li> <li>- Cross-affiliate netting arrangements</li> <li>- Risk transfers</li> <li>- Back-to-back trading arrangements</li> <li>- Service level agreement</li> <li>- Other</li> </ul>
060	<p><b>Description</b> To be mandatory filled when columns 010 to 050 are filled</p>

#### 16. Annex XI - Authorities

The following items of Section B of BRRD Annex are covered by this template:

*(16) Supervisory and resolution authority for each legal entity*

*(18) Description of the arrangements that the institution has in place to ensure that, in the event of resolution, the resolution authority will have the necessary information, as determined by the resolution authority, for applying the resolution tools and powers*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Name
020	<p><b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.</p>
030-040	Supervisory authority
030	Name
040	Contact details
050-060	Resolution authority
050	Name
060	Contact details
070-080	Deposit Guarantee Authority
070	Name
080	Contact details

#### 17. Annex XII – Legal impact of resolution

The following items of Section B of BRRD Annex are covered by this template:

*(19) All the agreements entered to by the institutions and their legal entities with third parties the termination of which may be triggered by a decision of the authorities to apply a resolution tool and whether the consequences of termination may affect the resolution tool*

Instructions concerning specific columns

Columns	Legal reference and instructions
010-020	Legal entity
010	Name
020	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
030-040	Third party
030	Name
040	<b>Legal Identifier</b> 20-digit, alpha-numeric code of the legal entity identified in Column 010. The Legal identifier uniquely identifies every legal entity or structure that is party to a financial transaction, in any jurisdiction.
050	Type of contract
060	<b>Termination affecting resolution tool</b> Y ('yes') or N ('no')
070	Comments

**Annex XIV - Eligible liabilities for MREL**

010	<b>Legal entity name</b>	<i>Bank A</i>
020	<b>Legal identifier</b>	<i>111</i>
030	<b>Governing law</b>	<i>EU</i>
040	<b>Date</b>	<i>31/12/2014</i>

	<b>Counterparties</b>	<b>MREL eligible liabilities</b>		
		[1 year ; 3 years[	[3 years ; 5 years]	> 5 years
		010	020	030
050	Natural persons			
060	Micro, small and medium-sized enterprises			
070	Large non-financial enterprises			
080	Banks			
090	Insurance undertakings, reinsurance undertakings, pension and retirement funds			
100	Other financial undertakings			
110	Intragroup			
120	Others			
130	<b>TOTAL</b>			