



The Bank of New York Mellon SA/NV
The European Bank

Pillar 3 Disclosure

September 30, 2023

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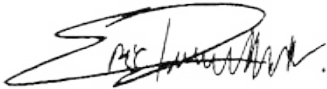
Attestation Statement

The 30 September 2023 Pillar 3 Disclosure meets the relevant regulatory requirements as described in section 1 of this report and it has been prepared in accordance with the internal policies and controls in place.

As set out in section 3 of this report, the Board of Directors ('the Board') is responsible for approving policies and procedures as may be required by law or otherwise appropriate and for reviewing The Bank of New York Mellon SA/NV's (the 'European bank') processes for compliance with applicable laws, regulations and the internal policies including the Code of Conduct.

The disclosures were approved by the European bank's Executive Committee ('ExCo') and signed on its behalf on 19 December 2023 by:

Eric Pulinx
Chief Financial Officer
Member of the Executive Committee





1 Article 431 CRR II - Disclosure requirements and policies

This Pillar 3 disclosure is published for the European bank, in accordance with the disclosure principles of the National Bank of Belgium^{1,2} ('NBB'), the Capital Requirements Directive³ ('CRD V') and the Capital Requirements Regulation⁴ ('CRR II'), complementing the annual financial statements.

This disclosure encompasses the European bank, its consolidated subsidiary undertaking and branches as at 30 September 2023. The European bank considers its risk management arrangements and systems are adequate with regards to its profile and strategy. This disclosure is consistent with formal policies adopted regarding production and validation.

Pillar 3 disclosures are required for a consolidated group and for those parts of the group covered by CRD V. When assessing the appropriateness of these disclosures in the application of Article 431(3) of CRR II, the European bank has ensured adherence to the principles of clarity, meaningfulness, consistency over time, and comparability across institutions.

The Basel Committee on Banking Supervision ('BCBS') requires these disclosures to be published at the highest level of consolidation. The European bank has adopted this approach with information presented at a fully consolidated level.

¹ NBB Circulars 2015_25 and 2017_25: Orientations relatives à la publication d'informations (Pilier III, CRD IV), 3 September 2015 and 2 October 2017.

² NBB Supervisory Disclosure Rules and Guidance: <https://www.nbb.be/en/financial-oversight/prudential-supervision/areas-responsibility/credit-institutions/supervisory-5>

³ Directive 2019/878/EU of the European Parliament and of the Council of 20 May 2019, amending Directive 2013/36/EU.

⁴ Regulation (EU) 2019/876 of the European Parliament and of the Council of 20 May 2019 amending Regulation (EU) No 575/2013.

1.1 Purpose of Pillar 3

The aim of the Pillar 3 disclosure is to provide market participants with accurate, comparable and comprehensive information regarding the risk profile of the European bank. This includes key information on the scope of application, capital, risk-weighted exposures, risk management processes and remuneration, enabling users to better understand and compare its business, its risks and capital adequacy.

To that end, these Pillar 3 disclosures focus only on those risk and exposure types required for disclosure by the European bank at this disclosure date, namely a summary of internal loss absorbing capacity and eligible liabilities.

Where appropriate, the disclosures also include comparatives for the prior periods and an analysis of the more significant movements to provide greater insight into the risk management practices of the European bank and its risk profile.

In addition, the European bank's annual year-end Pillar 3 disclosures include detailed quantitative and qualitative information on exposures, risk management, governance arrangements, and remuneration policies and practices for members of staff whose activities have a material impact on the European bank's risk profile.

1.2 Article 432 CRR II - Non-material, proprietary or confidential information

The Board may omit one or more disclosures if the information provided is not regarded as material. The criterion for materiality used in these disclosures is that the European bank will regard as material any information where 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.

Furthermore, the Board may omit one or more disclosures if the information provided is regarded as proprietary or confidential. Information is regarded as proprietary if disclosing it publicly would undermine the European bank's competitive position or the competitive position of the BNY Mellon group. It may include information on products or systems which, if shared with competitors, would render investment in the European bank or the BNY Mellon group less valuable. In such circumstance, the Board will state in its disclosures the fact that specific items of information are not disclosed and the reason for non-disclosure. In addition, it will publish more general information about the subject matter of the disclosure requirement except where this is classified as proprietary or confidential.

Pillar 3 disclosures are prepared solely to meet Pillar 3 disclosure requirements and for no other purpose. These disclosures do not constitute any form of financial statement on the business nor do they constitute any form of contemporary or forward looking record or opinion about the business. The European bank undertakes no obligation to revise or to update any forward-looking or other statement contained within this report regardless of whether or not those statements are affected as a result of new information or future events.

1.3 Article 433/434 CRR II - Frequency, scope and means of disclosures

Pillar 3 disclosures for the European bank and its only consolidated subsidiary, BNY Mellon Service Kapitalanlage-Gesellschaft mbH ('BNY Mellon KVG'), are published at a fully consolidated level.

Pillar 3 disclosures are approved by the ExCo, which has verified that they are consistent with formal policies adopted regarding production and validation.

Wherever possible and relevant, the ExCo will ensure consistency between Pillar 3 disclosures, Pillar 1 reporting and Pillar 2 ICAAP ('Internal Capital Adequacy Assessment Process') content, e.g. disclosure about risk management practices and capital resources at year-end. Unless indicated otherwise, information contained within the Pillar 3 disclosure has not been subject to external audit.

Disclosure will be made in accordance with the requirements of Article 433a. The European bank will publish semi-annual disclosures in line with Article 433a(2) and quarterly disclosures in line with Article 433a(3). Annual disclosures will be published on the same date on which the Annual Report and Financial Statements are made public. Quarterly disclosures will be published on the same date as the date on which any financial reports for the corresponding period are published, where applicable, or as soon as possible thereafter. The European bank will reassess the need to publish some or all of the disclosures, including applicable content, more frequently in light of any significant change to the relevant characteristics of its business including disclosure about capital resources and adequacy, and information about risk exposure and other items prone to rapid change.

The Bank of New York Mellon SA/NV

The European bank's disclosures and annual report are published on The Bank of New York Mellon corporate website which can be accessed using the link below:

[BNY Mellon Investor Relations - Pillar 3](#)

See the Additional Country Disclosures section.

1.4 Scope of consolidation

The Pillar 3 disclosures have been produced for the European bank on a consolidated basis, aligned to its annual accounts which includes its branches and consolidated subsidiary, BNY Mellon Service Kapitalanlage-Gesellschaft mbH ('BNY Mellon KVG'), but excluding BNY Mellon AIS Nominees Limited which is a non-consolidated subsidiary.

The European bank is a credit institution incorporated in Belgium. It is a subsidiary of The Bank of New York Mellon, a New York banking corporation with trust powers, having its principal office in New York, which is itself a subsidiary of The Bank of New York Mellon Corporation, the ultimate parent company of the BNY Mellon Group.

BNY Mellon Group ('BNY Mellon') is a global investments company dedicated to helping its clients manage and service their financial assets throughout the investment lifecycle. Whether providing financial services for institutions, corporations or individual investors, BNY Mellon delivers informed investment management and investment services in 35 countries and more than 100 markets. As of 30 September 2023, BNY Mellon had \$45.7 trillion in assets under custody and/or administration, and \$1.8 trillion in assets under management. BNY Mellon can act as a single point of contact for clients looking to create, trade, hold, manage, service, distribute or restructure investments. BNY Mellon is the corporate brand of The Bank of New York Mellon Corporation (NYSE: BK). Additional information is available on www.bnymellon.com. Follow us on Twitter [@BNYMellon](#) or visit our newsroom at www.bnymellon.com/newsroom for the latest company news.

The European bank is subject to dual supervision in Belgium: for market conduct matters, supervision is exercised by the Financial Services and Markets Authority (the 'FSMA') while for prudential matters, supervision is exercised by the European Central Bank (the 'ECB') together with the National Bank of Belgium (the 'NBB'), acting as National Competent Authority, as the European bank has been identified as a significant bank within the Single Supervisory Mechanism. In addition, the European bank's resolution authority is the Single Resolution Board ('SRB'). The European bank also qualifies as a Belgian custodian bank and is directly supervised by the NBB in this respect. Its ten branches and consolidated subsidiary ('BNY Mellon KVG') all are regulated entities with banking licenses subject to local supervision by national regulators with the exceptions of the London branch (notification of branch closure was filed on 19th July 2023 at Company House) and Poland branch (non-regulated).

Name	Type	Regulator
Amsterdam Branch	Branch	De Nederlandsche Bank ('DNB')
Copenhagen Branch	Branch	Danish Financial Supervisory Authority ('DFSA')
Dublin Branch	Branch	Central Bank of Ireland ('CBI')
Frankfurt Branch	Branch	Deutsche Bundesbank ('DB') & Federal Financial Supervisory Authority / Bundesanstalt für Finanzdienstleistungsaufsicht ('BaFin')
London Branch	Branch	Notification of branch closure was filed on 19th July 2023 at Company House
Luxembourg Branch	Branch	Commission de Surveillance du Secteur Financier ('CSSF')
Madrid Branch	Branch	Banco de España ('BDE')
Milan Branch	Branch	Banca D'Italia ('BI')
Paris Branch	Branch	Autorité De Contrôle Prudentiel ('ACPR'), Banque De France ('BD')
Poland Branch	Branch	Non-regulated
BNY Mellon KVG	Subsidiary	Bundesanstalt für Finanzdienstleistungsaufsicht ('BaFin')

1.5 Organisational structure

The European bank is a corporation with a Banking License, recognised as a custodian bank. The European bank has its headquarters in Brussels and is a wholly owned subsidiary of The Bank of New York Mellon (100% of share capital).

The European bank provides services on a passported basis through its headquarters in Brussels and its branches in Amsterdam, Dublin, Frankfurt, Luxembourg, Milan, Madrid, Copenhagen and Paris. The European bank also has a subsidiary in Frankfurt, BNY Mellon KVG. Pursuant to the EU single market directives, the European bank is authorised to provide financial services in the European Economic Area, being the EU 27 countries plus Iceland, Lichtenstein, and Norway. Some of those countries apply restrictions to passporting rights, in accordance with the local transpositions of the EU directives. The European bank complies with these restrictions and adapts its operations accordingly. The license for the London branch of the European bank was removed on the 4th July 2023. Notification of branch closure was filed on 19th July 2023 at Company House.

History

The European bank was established in 2008 with the aim of becoming BNY Mellon's main banking subsidiary in Continental Europe. During 2009, part of the business of the Brussels Branch of BNY Mellon was integrated into the European bank, forming the current Brussels Head Office.

As part of BNY Mellon's strategy to consolidate its legal entity structure in Europe, the European bank acquired branches in Amsterdam, London, Frankfurt and Luxembourg further to the merger with BNY Mellon GSS Acquisition Co. (Netherlands) BV on October 1, 2009.

On June 1, 2011, further to the merger with The Bank of New York Mellon's acquired German subsidiary, BNY Mellon Asset Servicing GmbH, the European bank significantly expanded the activities of its Frankfurt branch and Frankfurter Service KapitalverwaltungsGesellschaft mbH became the European bank's fully owned subsidiary under the name of BNY Mellon Service Kapitalanlage-Gesellschaft mbH ('BNY Mellon KVG'). On December 1, 2011, the European bank opened a branch in Paris.

On February 1, 2013, the European bank opened a new branch in Dublin as a result of the cross-border merger with The Bank of New York Mellon (Ireland) Limited.

An additional branch in Milan was created on April 1, 2017 as a result of the merger of The Bank of New York Mellon (Luxembourg) S.A. into the European bank.

On 29 November 2019 the European bank merged with BNY Mellon Trust Company (Ireland) Limited.

On 1 December 2020 the Copenhagen representative office was converted into the European bank's Copenhagen Branch. The European bank's commitment to this region was enhanced with the subsequent acquisition of Nykredit's depositary business effective on 1 November 2021. This was followed by the conversion of the Madrid representative office into the European bank's Madrid Branch on 1 February 2021. This provides an enhanced level of service and support to clients in Denmark, Spain and the wider Nordics and Iberian regions, by offering innovative solutions and providing access to BNY Mellon's global capabilities. Prior to conversion, Copenhagen was a representative office of the European bank whilst Madrid was a representative office of BNY Mellon Institutional Bank.

As of December 21, 2022, approval has been granted from the European bank's Executive Committee, the Branch Management of the Frankfurt Branch of the European bank, the Supervisory Board of the KVG and the Board of Directors of the KVG for the sale of the Legal KVG business to a third party. This being part of a multi leg plan with the intention to also sell the KVG Risk Control business and to merge the remaining KVG into the parent company. The estimated timing for the transfer of the business is due for completion by the end of Q1 (1st January - 31st March) 2024. Accordingly, the business being disposed of is accounted as held for sale. Similarly, on the 4th July 2023 the European bank's London Branch received local regulatory confirmation of the removal of licenses.

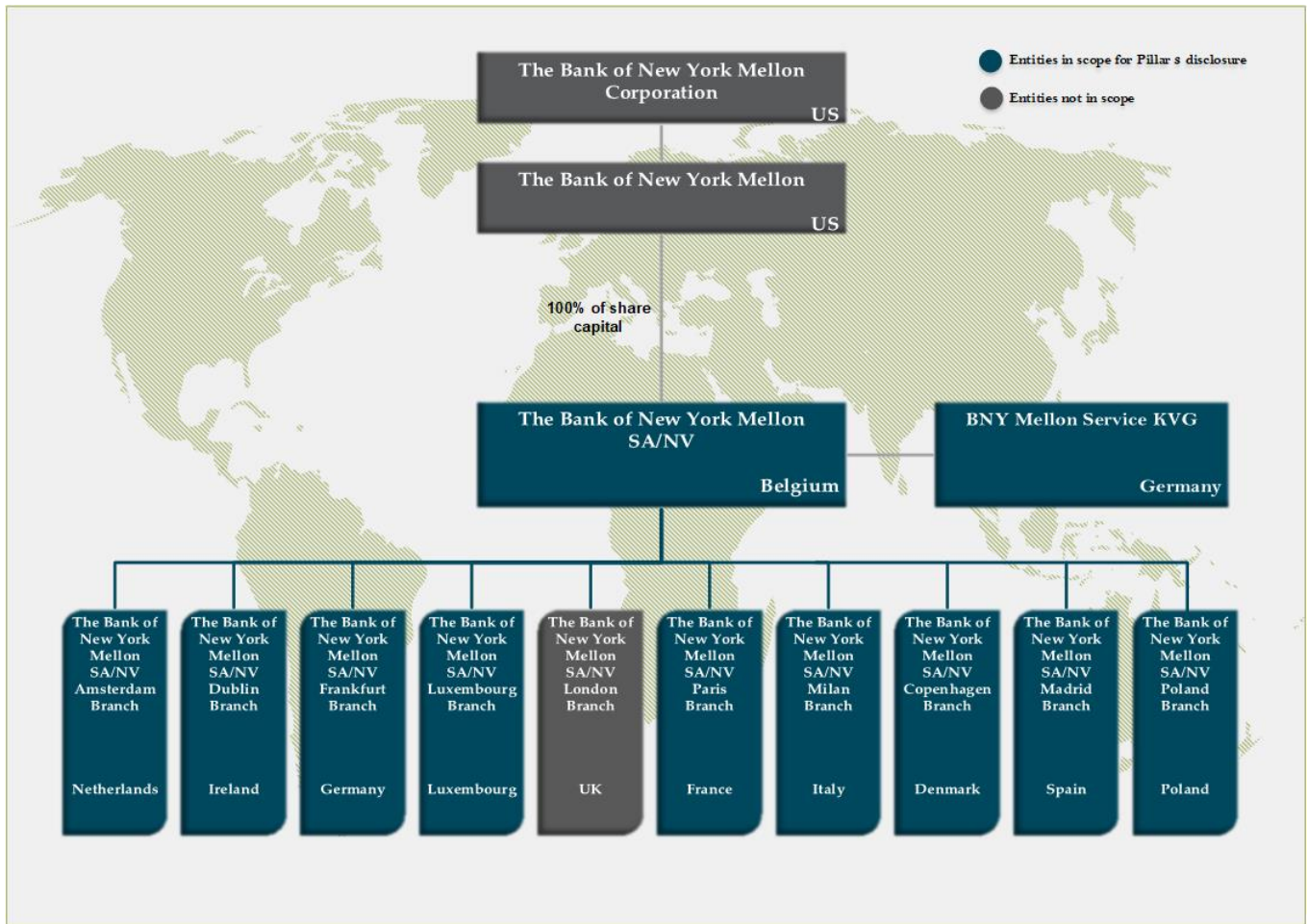
To support future growth, a non-contracting and non-deposit taking branch was opened in the first quarter of 2023 in Wroclaw (Poland).

Supervision

Effective November 4, 2014, the ECB as part of Single Supervisory Mechanism ('SSM') became the principal regulator for the European bank along with the NBB. The European bank is also supervised by the FSMA which is responsible for the integrity of the financial markets and fair treatment of financial consumers in Belgium pursuant to the Act of 2 August 2002 on the supervision of the financial sector and on financial services.

On November 20, 2015, the European bank was designated as a domestic systemically important institution (referred to in the CRD V as an "other systemically important institution" or "O-SII") in Belgium.

Figure 1: The European bank's legal entity structure at 30 September 2023



Note: The European bank's London Branch license was removed on the 4th July 2023, it is now a non-regulated branch pending closure. No activities exist in the branch and no client assets or liabilities remain. Equally, the subsidiary is presently carried as a discontinued operation held for sale. Further, the European bank's non-consolidated subsidiary BNYM AIS Nominees Limited is not shown.

Basis of consolidation

Entity name	Consolidation basis	Services provided
BNY Mellon SA/NV	Fully consolidated	Belgian credit institution and is also recognized as a Belgian custodian bank who's services include; Asset servicing, Clearance and Collateral Management, Markets.
BNY Mellon KVG	Fully consolidated	A capital investment company which is an independent provider of fund administration and investment management services.
BNY AIS Nominees Limited	Non-consolidated	Acts as a nominee shareholder on behalf of clients of its parent and sole shareholder the Bank of New York Mellon SA/NV Dublin Branch.

Subsidiaries are consolidated from the date on which control is transferred to the European bank until the date the European bank ceases to control the subsidiary. Control is achieved when the European bank is exposed to, or has rights to, variable returns from its involvement with the investee and has the ability to affect those returns through its power over the investee. Specifically, the European bank controls an investee if, and only if, the European bank has:

- power over the investee (i.e., existing rights that give it the current ability to direct the relevant activities of the investee);
- exposure, or rights, to variable returns from its involvement with the investee; or,
- the ability to use its power over the investee to affect its returns.

The existence and the effect of potential voting rights that are currently exercisable or convertible are considered when assessing the control of the European bank over another entity. The European bank re-assesses whether or not it controls an investee if facts and circumstances indicate that there are changes to one or more of the three elements of control.

1.6 Operating model

The Operating Model refers to how BNY Mellon collaborates, organises and manages its business with a focus on optimising the balance sheet, driving efficiencies and enabling growth. It also describes the operations and technology which enables businesses to serve clients. The model has evolved and covers 5 key areas: Banking and other entities (which includes the EMEA Operating Model Programme or Three-Bank-Model), Governance & Accountability, Booking and Solicitation Practices, Resilience - Operations and Technology, and FX Trading. Furthermore, regulatory change has been a large component of the change agenda and will continue to be so with a large number of regulatory change initiatives in execution mode as well as on the horizon. Digital and data initiatives are also key to the European bank's strategy.

Banking and other Entities (EMEA Operating Model Programme) - This has been a major strategic initiative for BNY Mellon in the EMEA region over the past few years rationalising its legal entity structure to a three bank model, establishing a dual sub-custody network and aligning clients to the appropriate legal entity and network.

Governance & Accountability - In close consultation with the European Central Bank, BNY Mellon have been particularly focused on strengthening the governance and accountability within the European bank. Senior leadership has been engaged in a governance and accountability review related to the reporting line structure, aimed at meeting regulatory expectations as well as those of our clients and other stakeholders.

Booking and Solicitation Practices - Booking Principles are BNY Mellon's approach to guide the booking of business to the appropriate legal entity for each client's domicile and product considering local rules, licenses, permissions and product infrastructure. The European bank is guided as the main booking entity (where possible) for EU domiciled clients. Any proposed booking for non-EU jurisdictions would be subject to the relevant conditions and restrictions from the applicable third country regime for regulated activity. Booking Principles are maintained by the lines of business and centrally coordinated through a First Line of Defense Controls Framework.

Resilience – Operations and Technology - The European bank is documenting its detailed Technology Strategy in a distinct document and this will be developed alongside and in close alignment with the European bank's Business Strategy and the Enterprise Technology Strategy.

FX Trading - "ECB supervisory expectations on booking models" requires that a percentage of the risk generated from the 27 European Union countries (the 'EU27') client FX flow be risk managed within the European bank; and that the European bank can no longer rely on a 100% back to back booking model to the BNYM Institutional Bank (the 'BNYM IB'). Pursuant to this, the European bank set up an FX trading desk within its Frankfurt branch to end the reliance on a 100% back to back BNYM IB booking model. This FX Trading desk is now risk managing the majority of the EU27 client flow within the European banking entity.

1.7 Core business lines

With activities focussed on the Securities Services and Markets & Wealth Services segments, the European bank has a number of core business lines. Its main activity is Asset Servicing, which is provided both to third party and to internal clients within BNY Mellon, but also Treasury, Corporate Trust, Depository Receipt Services, Foreign Exchange, Collateral Management, Liquidity Services and Segregation, Global Clearance and Securities Financing.

Line of business	Description
Asset Servicing & Digital ('AS')	Asset Servicing & Digital primarily comprises Custody Services but also includes Trustee & Depository Services, Institutional Accounting, Fund Accounting, Transfer Agency Services, Middle Office Solutions, Alternative Investments Services, Global Risk Solutions, and oversight of outsourced Investment Management Services.
Treasury Services	Treasury Services ('TS') market and sell USD, GBP & EUR Correspondent Bank Clearing Services including supplementary products (e.g. FX and Multi-Currency) to eligible European domiciled clients. This is done through TS personnel employed by the European bank. The European bank acts in an intermediary role in marketing and selling the products as the contract is with the BNYM IB.
Issuer Services	
Corporate Trust ('CT')	The European bank offers Corporate Trust Services, acting in a broad range of agency roles including, but not limited to: trustee, registrar, issuing and paying agent, common depository, exchange agent, custodian and collateral / portfolio administration.
Depository Receipt Services	The European bank's Dublin Branch performs certain operational activities relating to Depository Receipts, predominantly issuance and cancellation. Depository Receipts facilitate cross-border investment solutions for companies and investors. They are negotiable financial securities issued by a bank to represent foreign companies' publicly traded securities, allowing them to have their stocks traded in foreign markets.
Clearance, Markets and Collateral Management	
Foreign Exchange ('FX')	The European bank provides foreign exchange services, which enable clients to achieve their investment, financing and cross-border objectives.
International Collateral Management	The European bank acts as Tri-Party agent to collateral providers and receivers for collateral management transactions including, but not limited, to Tri-Party Repo, securities lending and pledge transactions.
Liquidity Services and Segregation	The European bank provides liquidity services (safekeeping of margin balances, reporting and, purchase and redemption of money market instruments), margin management services and segregation and valuation services.
International Clearance	International Clearance provides Settlement and Custody services for fixed- income and equity securities.
Securities Finance	The European bank provides standard agency lending including Third Party lending; cash reinvestment and agency cash investment products.

Key External Factors Influencing the European bank

At the end of September 2023 the European bank's consolidated Regulatory Own Funds saw an increase of €34 million on the June 2023 position which was largely attributable to an increase in Other Comprehensive Income reserves of €32 million. Risk weighted assets also increased by €732 million which collectively resulted in a 7.2% decrease in the European bank's consolidated capital ratio.

Overall, for the year to September 2023, the European bank's consolidated Regulatory Own Funds increased by €78 million, largely due to an overall reduction in Other Comprehensive Income losses by €72 million. Risk weighted assets increased by €323 million mainly due to an increase in exposures to Corporates. Growth in exposures to Institutions was largely offset by reductions in exposures to Other Assets. Overall, this resulted in a moderate 1.9% decrease in the European bank's consolidated capital ratio.

At the end of September 2023 the spot Balance Sheet amounted to €36.0 billion, representing a €4.1 billion decrease on December 2022. The main drivers of the year to date decrease on the assets side were lower Central Bank Placements and Third Party Nostro & Placements, down €4.8 billion and €1.1 billion respectively. This was partly offset by a moderate increase in Intercompany Nostro & Placements of €1.6 billion. Other notable variances saw decreases in Other Assets of €0.3 billion offset by increases in Overdrafts & Advances and Investment Securities of €0.4 billion and €0.1 billion respectively.

On the liabilities side the decrease was primarily driven by falls in Long Term Debt and Third Party Deposits, both down €2.4 billion and €2.1 billion respectively. Other notable variances included a reduction in Other Liabilities of €0.6 billion which was offset by increases in Intercompany Deposits, Equity and Repo liabilities of €0.6 billion, €0.3 billion and €0.1 billion each.

The European bank's pre-tax income amounted to €324.9 million as at 30 September 2023, up 19% compared to the equivalent period from the prior year. The main driver for the increase was higher Net Interest Income & Swaps, reflecting the higher EUR and USD interest rate environments. Other Income was down largely related to non-repeat of tax recoveries. Net Intercompany Fees paid, namely fund accounting and technology charges, were higher. Reductions in Fee and Commission Income largely stemmed from lower asset servicing revenue whilst Personnel Expenses were also higher following restructuring initiatives. ADR revenue also increased moderately due to non-repeat of impairment charges.

BNY Mellon is well-positioned against competition thanks to BNY Mellon Group's legal entities rationalisation strategy. BNY Mellon has a unique selling proposition that fits the needs of our clients, with the European bank positioned as the Group's 'European Bank'.

Business Evolution in 2023

In 2023, the European bank reduced a small percentage of roles in order to redeploy savings into investment areas, and to fuel development opportunities for employees. These limited reductions come on top of the transformations that are being executed in the Brussels headquarters and the branches in The Netherlands and Germany referred to above. This notably aligns with our goal of optimizing our workforce, better serving our clients and fostering a high-performing culture. Impacts of these reductions have been carefully considered and mitigated within the related business.

As of 1 January 2023 the European bank's Pillar 2 requirement increased from 2% to 2.1%.

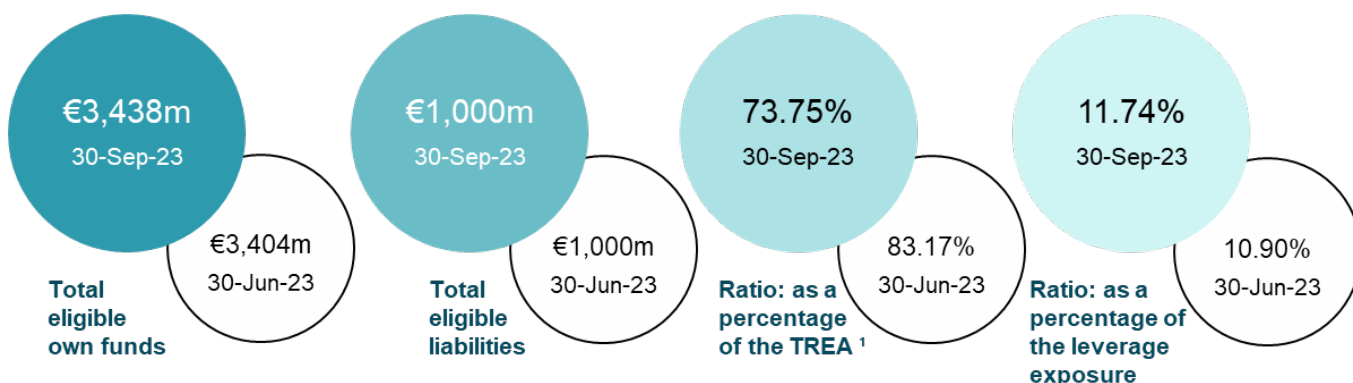
The European bank has successfully registered the brand-new branch of the European Bank in Wroclaw (Poland). The branch will deliver administrative and operational support services to the European Bank and other BNY Mellon legal entities. It was officially opened in the first quarter of 2023, after a select group of existing employees in Poland have been transferred to the new legal entity. The branch opening will strengthen our European regional footprint and support the work of the European Bank. There will be no impact to the service provided to clients.

Following a strategic decision to close the London branch of the European bank, the branch's license was removed as of the 4th of July 2023, notification of the branch closure was filed on 19th July 2023 at Company House.

Looking towards the near term, the Market Risk Alternative Standardised Approach ('MKR-ASA') will become binding on the European bank as part of the next iteration of Capital Requirements Regulation reforms effective from 2025 ('CRR III'). Within CRR III, elements relating to the Own Funds requirement, including the MKR-ASA, and ESG related disclosures, will become binding. Such updates will be reflected in the European bank's disclosures accordingly. Market risk calculations under this new framework are reported but are not required to be disclosed presently.



2 Article 437a CRR II - Own funds and eligible liabilities



¹ Total Risk Exposure Amount

This section provides an overview of the composition of the European bank's regulatory capital and eligible liabilities.

Own Funds comprise tier 1 capital less deductions.

The European bank's regulatory capital is defined by CRD V and includes Common Equity Tier 1 capital which is the highest quality form of regulatory capital under Basel III comprising common shares issued and related share premium, retained earnings and other reserves excluding the cash flow hedging reserve, less specified regulatory adjustments.

Composition of regulatory capital

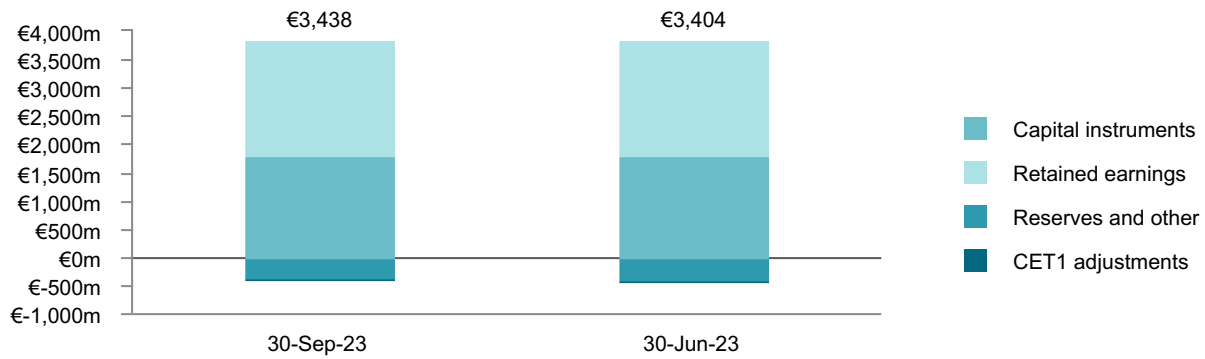


Table 3: EU ILAC Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs

In accordance with the requirements of Article 92b of Regulation (EU) No 575/2013, the table below and on the following page shows the European bank's minimum requirement for eligible liabilities, being a material subsidiary of a non-EU G-SII.

The European bank is not classified as a resolution entity but carries an eligible liability of €1 billion as defined by Article 45 to 45i of Directive (EU) No 2014/59, being the total amount of that issuance. The information is presented on a consolidated basis.

Internal TLAC requirements are based on a fully loaded target applicable as of 1 January 2022: 90% of 18% RWA and 6.75% Leverage Ratio Exposure, whichever is higher.

At 30 September 2023 (€m)	Minimum requirement for own funds and eligible liabilities (internal MREL)	Non-EU G-SII Requirement for own funds and eligible liabilities (internal TLAC)	Qualitative information
Applicable requirement and level of application			
EU 1 Is the entity subject to a Non-EU G-SII Requirement for own funds and eligible liabilities?			Y
EU 2 If EU 1 is answered by 'Yes', is the requirement applicable on a consolidated or individual basis?			C
EU 2a Is the entity subject to an internal MREL requirement?			Y
EU 2b If EU 2a is answered by 'Yes', is the requirement applicable on a consolidated or individual basis?			C
Own funds and eligible liabilities			
EU 3 Common Equity Tier 1 capital (CET1)	3,438	3,438	
EU 4 Eligible Additional Tier 1 instruments	—	—	
EU 5 Eligible Tier 2 instruments	—	—	
EU 6 Eligible own funds	3,438	3,438	
EU 7 Eligible liabilities	1,000	1,000	
EU 8 of which permitted guarantees	—		
EU 9a (Adjustments)	—		
EU 9b Own funds and eligible liabilities items after adjustments	4,438	4,438	
Total risk exposure amount and total exposure measure			
EU 10 Total risk exposure amount	6,017	6,017	
EU 11 Total exposure measure	37,799	37,799	
Ratio of own funds and eligible liabilities			
EU 12 Own funds and eligible liabilities (as a percentage of TREA)	73.75 %	73.75 %	
EU 13 of which permitted guarantees	— %		
EU 14 Own funds and eligible liabilities (as a percentage of leverage exposure)	11.74 %	11.74 %	
EU 15 of which permitted guarantees	— %		
EU 16 CET1 (as a percentage of TREA) available after meeting the entity's requirements	35.03 %	35.03 %	
EU 17 Institution-specific combined buffer requirement		3.94 %	
Requirements			
EU 18 Requirement expressed as a percentage of the total risk exposure amount	22.10 %	16.20 %	
EU 19 of which may be met with guarantees	— %		
EU 20 Internal MREL expressed as percentage of the total exposure measure	5.90 %	6.075 %	
EU 21 of which may be met with guarantees	— %		
Memorandum items			
EU 22 Total amount of excluded liabilities referred to in Article 72a(2) CRR		31,178	

Note: Due to rounding there may be immaterial variations between Pillar 3 and regulatory submissions.

In comparison to June 2023, the European bank's Own Funds position saw a moderate increase over the previous quarter. Equally, the Total Risk Exposure Amount ('TREA') rose proportionally more due to credit risk drivers collectively resulting in an 9.42% decrease in the own funds and eligible liabilities ratio as a percentage of the TREA. Conversely, the Total Exposure Measure ('TEM') decreased, which when considered with the moderate increase in Own Funds resulted in a broadly static movement in the eligible liabilities ratio as a percentage of TEM, up 0.84%. CET1 available after complying with MREL targets is consequently influenced by variations in TREA, TEM, and Own Funds.

The underlying components of excluded liabilities varied over the quarter with the net effect being a decrease of 7%, broadly in line with balance sheet variation. Overall, excluded liabilities fell by €2.3 billion with sight deposits and short term deposits being the main driver whilst other components netted to a smaller increase.

Risk



3 Article 435 CRR II - Risk management objectives and policies

Given the critical role that BNY Mellon plays supporting clients and its status as a Global Systemically Important Financial Institution ('G-SIFI'), while the European Bank is an Other Systemically Important Financial Institution ('O-SIFI'), the financial stability of all of its constituent legal entities, throughout market cycles and especially during periods of market turbulence, is recognised at a BNY Mellon group level as an imperative. Clients and market participants need to have confidence that all of the BNY Mellon's legal entities will remain strong, continue to deliver operational excellence and maintain an uninterrupted service. Therefore, the European bank and the BNY Mellon group as a whole are committed to maintaining a strong balance sheet and, as a strategic position, assumes less risk than many financial services companies.

Whilst BNY Mellon assumes less balance sheet risk than most financial services companies, it does assume a significant amount of operational risk as a result of its business model. As a consequence, BNY Mellon has developed an enterprise risk management programme that is designed to ensure that:

- risk limits are in place to govern its risk-taking activities across all businesses and risk types;
- risk appetite principles are incorporated into its strategic decision making processes;
- monitoring and reporting of key risk metrics to senior management and the board takes place; and,
- there is a capital planning process which incorporates both economic capital modelling and a stress testing programme.

For more information regarding the European bank's risks, its risk management objectives, policies, and its risk statement please refer to the most recent annual Pillar 3 disclosure published on The Bank of New York Mellon corporate website, accessible via the link below:

[BNY Mellon Investor Relations - Pillar 3](#)

3.1 Board of Directors

The Board is composed of a majority of non-executive directors, some of whom are representatives of The Bank of New York Mellon senior management. At least two of the non-executive directors are independent directors (as defined in the Belgian Banking Law). All members of the ExCo also sit on the Board in compliance with Article 24 of the Belgian Banking Law. All directors are natural persons.

The Board meets formally once a quarter or more frequently if deemed appropriate. Board meetings can be called whenever the specific needs of the business require it.

The primary responsibilities of the Board are to define the strategy and risk policy of the European bank and to supervise the European bank's management.

The main duties and responsibilities of the Board of the European bank include, but are not limited to:

- defining the general business strategy, objectives and values of the European bank in line with those of The Bank of New York Mellon;
- plan and monitor the implementation of the general business strategy, objectives and values within the European bank;
- fixing the European bank's risk tolerance level and regularly reviewing and approving the strategies and policies relating to the taking, management, follow-up and mitigation of risks;
- supervising the management of the European bank's significant risks and ensuring adequate resources are allocated to it;
- approving the capital adequacy position and ensuring changes in the European bank consider capital impacts;
- approving the recovery plan;
- approving the liquidity recovery plan;
- supervising effectively the ExCo and the decisions taken by the ExCo;
- drawing up annual and interim reports and accounts;
- assessing regularly (at least once per year) the efficiency of the internal organisation and system of internal control of the European bank and its compliance with applicable laws and regulations;
- assessing the proper functioning of the European bank's independent control functions (risk, internal audit and compliance);
- ensuring the integrity of the accounting and financial reporting systems and assessing regularly (at least once per year) the efficiency of the internal control structure, in particular regarding the financial reporting process;
- ensuring that the European bank's internal governance - as translated into its Internal Governance Memorandum - is appropriate to its business, size and organization;
- approving the Internal Governance Memorandum and ensuring it is kept up-to-date and submitted to the supervisory authority;

The Bank of New York Mellon SA/NV

- approving and reviewing regularly (at least once per year) the European bank's remuneration policy, and supervising its implementation;
- selecting and evaluating the members of the ExCo and reviewing the process for the selection, evaluation, and development of other key managers (in particular the Chief Risk Officer, Chief Compliance Officer, Chief Internal Auditor);
- ensuring the succession planning for key managers;
- reviewing the European bank's processes for protecting the European bank's assets and reputation;
- approving policies and procedures as may be required by law or otherwise appropriate;
- reviewing the European bank's processes for compliance with applicable laws, regulations and the internal policies including the Code of Conduct; and,
- overseeing the process of external disclosure and communications.

The table below shows the members of the Board and its committees as at 30 September 2023.

External functions exercised by directors, senior managers and heads of independent functions are regularly published in accordance with Belgian Banking Law of 25 April 2014 on the legal status and supervision of credit institutions and brokerage firms, NBB Regulation of 9 November 2021 on the Exercise of External Functions by managers of Regulated Companies and NBB Communication on the exercise of external functions by managers and persons responsible for independent control functions of regulated companies NBB_2022_19.

Board member	Function at the European bank	Name of the other company in which an external function is exercised	Registered address	Type of activities	Listed company (Y/N)	External mandate (title)	Capital connection with SA/NV (Y/N)
Non-Executive Directors							
Olivier Lefebvre	Independent Chair of the Board, Independent Member of the Audit and Remuneration Committees, Independent Chair of the Nomination and Environmental Social Governance Committee	An Other Look To Efficiency SRL	Chausée de Tervueren 111, 1160 Auderghem, Belgium	Management company	N	Administrator	N
		Climact SA	Place de l'Université 16 Bte 11, 1348 Louvain-la-Neuve, Belgium	Environmental consultancy	N	Chairman of the Board	N
		Ginkgo Management II SARL	Boulevard Emmanuel Servais 20 L - 2535 Luxembourg, Luxembourg	Real Estate Fund Management	N	Independent Director	N
		Perma-Project SRL	Chausée de Tervueren 111, 1160 Auderghem, Belgium	Support to starters in Permaculture	N	Director	N
Marie-Hélène Crétu	Independent Chair of the Audit Committee, Independent member of the Remuneration and Risk Committees	CoDiese	102 bis, Rue de Miromesnil, 75008 Paris, France	Management company	N	President	N
		Global Reporting Company	31 Hove Park Way, Hove, England, BN3 6PW, United Kingdom	Finance consultancy	N	Director	N
Marcia Cantor-Grable	Chair of Claims and Reserves Committees, Member of the Audit, Nomination and Remuneration Committee	AXA XL Insurance Company UK Limited and AXA XL Underwriting Agencies Limited	20 Gracechurch Street, London EC3V 0BG	General Insurance	N	Independent Director	N
		Brown Shipley & Co. Ltd.	2 Moorgate, London, England, EC2R 6AG, United Kingdom	Wealth planning and Investment Management	N	Independent Director	N
		Modulr FS Ltd.	Scale Space, 58 Wood Lane, London, W12 7RZ, United Kingdom	E-money institution	N	Independent Director	N

Board member	Function at the European bank	Name of the other company in which an external function is exercised	Registered address	Type of activities	Listed company (Y/N)	External mandate (title)	Capital connection with SA/NV (Y/N)
Roderick Munsters ¹	Independent Chair of the Remuneration Committee, Independent member of the Risk Committee and Independent member of the Nomination and Environmental Social Governance Committees	Athora Netherlands NV	Burgemeester Rijnderslaan 7 1185 MD Amstelveen, the Netherlands	Insurance company	N	Chairman of the Supervisory Board	N
		Unibail-Rodamco-Westfield SE	7 Place du Chancelier Adenauer, 75116 Paris, France	Real Estate company	Y	Independent Director	N
		Wisayah Global Investment Company	P.O Box 5000, Dhahran, Postal Code 3131, Kingdom of Saudi Arabia	Investment Company	N	Non-Executive Director	N
Caroline Butler	Member of the Audit Committee and member of the Nomination and Environmental Social Governance Committee	Access Fintech	122 Grand Street New York, NY10013 USA	Fintech company	N	Independent Director	N
Hani Kablawi ²	Member of the Remuneration and Risk Committees	OMFIF Advisory Council	6-9 Snow Hill, London, EC1A 2AY, United Kingdom	Independent financial think tank for central banks and public investment	N	Deputy Chairman	N
Senthilkumar Santhanakrishnan ³	Member of the Risk Committee						
Executive Directors							
Björn Storim	Chief Executive Officer and Chair of the Executive Committee						
Eric Pulinx ⁴	Chief Financial Officer, Deputy Chief Executive Officer and Member of the Executive Committee	Delen Private Bank	Jan Van Rijswijklaan 184, 2020 Antwerp, Belgium	Credit Institution	N	Independent Director	N
		Finax	Begijnenvest 113, 2000 Antwerp, Belgium	Financial Holding	N	Independent Director	N

¹ As of 11 September 2023, Roderick Munsters took on the role of a Non-Executive Director at Wisayah, a Global Investment Company located in Saudi Arabia. The mandate was approved by the National Bank of Belgium/European Central bank on 1 September 2023.

² Hani Kablawi has 3 internal mandates as Director in addition to the external mandates stated in the disclosure.

³ Senthilkumar Santhanakrishnan has 2 internal mandates as Director.

⁴ Eric Pulinx has 1 internal mandate as Chair of the Board in addition to the external mandates stated in the disclosure.

Rachel Zahra was appointed as Executive Director and Chief Operations Officer by the shareholder of the European bank as of 1 October 2023. The appointment of Rachel Zahra has been approved by the National Bank of Belgium and the European Central Bank in September and October 2023 respectively.

No director has declared a personal conflict of interest that would give rise to the application of article 7:96 of the Belgian Companies and Associations Code.

The European bank is committed to diversity and inclusion. This commitment is not only important to the European bank's culture and to each director as individuals, it is also critical to the European bank's ability to serve its clients and grow its business. The European bank recognises the benefits of having individuals with diverse backgrounds, experience and viewpoints on the Board for the different perspective and unique contributions they provide. Board appointments are based on an individual's skill, ability, experience, training, performance, and other valid role-related requirements. The Terms and Reference of the Board state that at least one third of each gender shall be represented on the Board. This target has been achieved by the European bank at the reporting date.

The Nomination and Environmental Social Governance Committee (the 'Nomination & ESGCo') is responsible for reviewing the structure, size and composition of the Board (including its skills, knowledge, experience and diversity) and making recommendations to the Board with respect to any Board member's appointment. In identifying suitable candidates for a particular appointment, the Nomination & ESGCo considers candidates on merit and against objective criteria and with due regard for the benefits of diversity on the Board, including gender.

No external functions are exercised by branch managers and Heads of Independent Control Functions, i.e. the Head of the Compliance function, the Head of the Internal Audit function and the Senior Managers of the European bank. Note the Head of the Risk Management function is also independent.

Appendix 1 - Glossary of terms

The following acronyms are a range of terms which may be used in BNY Mellon EMEA Pillar 3 disclosures:

Acronym	Description	Acronym	Description
ABS	Asset-Backed Securities	CROC	Credit Risk Oversight Committee
ACPR	Autorite de Controle Prudentiel et de Resolution	CRR	Capital Requirements Regulation
AFR	Available Financial Resources	CSD	Client Service Delivery
AIF	Alternative Investment Fund	CSRSFI	Committee for Systemic Risks and System-relevant Financial Institutions
ALCO	Asset and Liability Committee	CSSF	Commission de Surveillance du Secteur Financier
ALM	Asset Liability Management	CSTC	Capital and Stress Testing Committee
AML	Anti-Money Laundering	CT	Corporate Trust
AS	Asset Servicing	CTS	Client Technology Solutions
AT1	Additional Tier 1	DB	Deutsche Bank
AUC	Assets Under Custody	DNB	De Nederlandsche Bank
BAC	Business Acceptance Committee	DVP	Delivery versus Payment
BAU	Business as usual	EAD	Exposure at default
BaFin	Federal Financial Supervisory Authority / Bundesanstalt für Finanzdienstleistungsaufsicht	EC	European Commission
BDAS	Broker-Dealer and Advisory Services	ECL	Expected Credit Losses
BDF	Banque De France	ECAP	Economic Capital
BEMCO	Belgium Management Council	ECB	European Central Bank
BI	Banca D'Italia	ECM	Embedded Control Management
BNY Mellon	The Bank of New York Mellon Corporation	EEC	EMEA Executive Committee
BNY Mellon SA/NV	The Bank of New York Mellon SA/NV	EHQLA	Extremely High Quality Liquid Assets
BNY Mellon TDUKL	BNY Mellon Trust & Depositary (UK) Limited	EMEA	Europe, Middle East and Africa
BNYIFC	BNY International Financing Corporation	ERGC	EMEA Remuneration Governance Committee
BNY Mellon	BNY Mellon Service	ESRMC	EMEA Senior Risk Management Committee
KG	Kapitalanlage-Gesellschaft mbH	EU	European Union
BRC	Business Risk Committee	EUR	Euro
CASS	Client Asset Sourcebook Rules	EWI	Early Warning Indicators
CBI	Central Bank of Ireland	ExCo	Executive Committee
CCF	Credit Conversion Factor	FCA	Financial Conduct Authority
CEO	Chief Executive Officer	FMUs	Financial market utilities
CEF	Critical Economic Function	FRS	Financial Reporting Standard
CET1	Common Equity Tier 1	FSMA	Financial Services and Markets Authority
CGB	CASS Governance Body	FX	Foreign Exchange
CIS	Collective Investment Scheme	G-SIFI	Global Systemically Important Financial Institution
CMA	Capital Market Authority	GCA	Global Custody Agreement
COC	Compensation Oversight Committee	GSP	Global Securities Processing
COOC	CASS Operational Oversight Committee	HQLA	High Quality Liquid Assets
COREP	Common Reporting	HRCC	Human Resources Compensation Committee
CQS	Credit Quality Steps	IAS	International Accounting Standards
CRD	Capital Requirements Directive	IASB	International Accounting Standards Board
CRM	Credit Risk Mitigation	ICA	Internal Capital Assessment
		ICAAP	Internal Capital Adequacy Assessment Process

Acronym	Description
ICRC	Incentive Compensation Review Committee
IFRS	International Financial Reporting Standards
ILAAP	Internal Liquidity Adequacy Assessment Process
ILG	Individual Liquidity Guidance
IRRBB	Interest Rate Risk on Banking Book
IMMS	International Money Management System
ISDA	International Swaps and Derivatives Association
ISM	Investment Services and Markets
IT	Information Technology
KRI	Key Risk Indicator
KYC	Know your customer
LCR	Liquidity Coverage Ratio
LERO	Legal Entity Risk Officer
LOB	Line of Business
LOD	Line of Defense
MiFID II	Markets in Financial Instruments Directive II
MNA	Master netting agreements
MRMG	Model Risk Management Group
MRT	Material Risk Taker
NAV	Net Asset Value
NBB	National Bank of Belgium
Nomination & ESGCo	Nomination and Environmental Social Governance Committee
NSFR	Net Stable Funding Ratio
O-SII	Other systemically important institution
OCI	Other Comprehensive Income
OEICs	Open-ended Investment Companies
ORMF	Operational Risk Management Framework
ORSA	Operational Risk Scenario Analysis
P/L	Profit and Loss
PFE	Potential Future Exposure
PRA	Prudential Regulatory Authority
RAS	Risk Appetite Statement
RCoB	Risk Committee of the Board
RCSA	Risk and Control Self-Assessment
RM	Risk Manager
RMC	Risk Management Committee
RMP	Risk Management Platform
RRP	Recovery and Resolution Planning
RW	Risk-weight
RWA	Risk Weighted Assets
SA	Standardised Approach
SFT	Security Financing Transaction
SLD	Service Level Description
SREP	Supervisory review and evaluation process
SRO	Senior Risk Officer

Acronym	Description
T&D	Trust & Depository
T1 / T2	Tier 1 / Tier 2
TCR	Total Capital Requirements
TRC	Technology Risk Committee
TLAC	Total Loss-Absorbing Capacity
UCITS	Undertakings for Collective Investment in Transferable Securities
VaR	Value-at-Risk

The following terms may be used in this document:

Ad valorem: Method for charging fees according to the value of goods and services, instead of by a fixed rate, or by weight or quantity. Latin for [according] to value

Basel III: The capital reforms and introduction of a global liquidity standard proposed by the Basel Committee on Banking Supervision ('BCBS') in 2020

BIPRU: Prudential sourcebook for banks, building societies and investment firms

Brexit: The United Kingdom's referendum decision to leave the EU

CRD V: On 27 June 2013, the European Commission first published, through the Official Journal of the European Union, its legislation for a Capital Requirements Directive ('CRD') and Capital Requirements Regulation ('CRR'), which together form the CRD package. The package implements the Basel III reforms in addition to the inclusion of new proposals on sanctions for non-compliance with prudential rules, corporate governance and remuneration. The latest iteration, CRD V & CRR II, applies from 28 June 2021 onwards, with certain requirements set to be phased in

Capital Requirements Directive ('CRD'): A capital adequacy legislative package issued by the European Commission and adopted by EU member states

Capital Requirements Regulation ('CRR'): Regulation that is directly applicable to anyone in the European Union and is not transposed into national law

Common Equity Tier 1 capital: The highest quality form of regulatory capital under Basel III comprising common shares issued and related share premium, retained earnings and other reserves excluding the cash flow hedging reserve, less specified regulatory adjustments

Core Tier 1 capital: Called-up share capital and eligible reserves plus equity non-controlling interests, less intangible assets and other regulatory deductions

Credit risk mitigation ('CRM'): A technique to reduce the credit risk associated with an exposure by application of credit risk mitigants such as collateral, guarantees and credit protection

Derivatives: A derivative is a financial instrument that derives its value from one or more underlying assets, for example bonds or currencies

Exposure: A claim, contingent claim or position which carries a risk of financial loss

Exposure at default ('EAD'): The amount expected to be outstanding, after any credit risk mitigation, if and when a counterparty defaults. EAD reflects drawn balances as well as allowance for undrawn amounts of commitments and contingent exposures over a one-year time horizon

Financial Conduct Authority ('FCA'): The Financial Conduct Authority regulates the conduct of financial firms and, for certain firms, prudential standards in the UK. It has a strategic objective to ensure that the relevant markets function well

Risk Identification ('Risk ID'): An assessment of the quality of controls in place to mitigate risk and residual risk. Residual risk is assessed as high, moderate to high, moderate, moderate to low and low with direction anticipated

Investment Firms Directive ('IFD'): A capital adequacy legislative package issued by the European Commission and adopted by EU member states calibrated to Investment Firms

Investment Firms Regulation ('IFR'): Regulation that is directly applicable to anyone in the European Union in respect of the application of IFD

Institutions: Under the Standardised Approach, institutions are classified as credit institutions or investment firms

Internal Capital Adequacy Assessment Process ('ICAAP'): The group's own assessment of the levels of capital that it needs to hold through an examination of its risk profile from regulatory and economic capital viewpoints

ISDA Master Agreement: A document that outlines the terms applied to a derivatives transaction between two parties. Once the two parties have agreed to the standard terms, they do not have to renegotiate each time a new transaction is entered into

Key Risk Indicator ('KRI'): Key Risk Indicators are used by business lines to evaluate control effectiveness and residual risk within a business process

Master Netting Agreement: An agreement between two counterparties that have multiple contracts with each other that provides for the net settlement of all contracts through a single payment in the event of default or termination of any one contract

Pillar 3: The part of Basel III that sets out information banks must disclose about their risks, the amount of capital required to absorb them and their approach to risk management. The aim is to encourage market discipline and improve the information made available to the market

Prudential Regulation Authority ('PRA'): The statutory body responsible for the prudential supervision of banks, building societies, credit unions, insurers and major investment firms in the UK. The PRA is a subsidiary of the Bank of England

Residual maturity: The period outstanding from the reporting date to the maturity or end date of an exposure

Risk appetite: A definition of the types and quantum of risks to which the firm wishes to be exposed

Risk and Control Self-Assessment ('RCSA'): Risk and Control Self-Assessment is used by business lines to identify risks associated with their key business processes and to complete a detailed assessment of the risk and associated controls

Risk Governance Framework: The risk governance framework has been developed in conjunction with BNY Mellon requirements. Key elements of the framework are:

- Formal governance committees, with mandates and defined attendees
- Clearly defined escalation processes, both informally (management lines) and formally (governance committees, board, etc.)
- A clear business as usual process for identification, management and control of risks
- Regular reporting of risk issues

Risk Management Committee ('RMC'): A committee which meets monthly to provide governance on risk related items arising from the business of the group

Risk-weighted Assets ('RWA'): Assets that are adjusted for their associated risks using weightings established in accordance with CRD V requirements

Standardised Approach ('SA'): Method used to calculate credit risk capital requirements using the Basel III, CRD V, CRR II model supplied by the BCBS. The SA model uses external credit assessment institution ratings and supervisory risk weights supplied by external credit assessment agencies

Tier 2 capital: A component of regulatory capital under Basel III, mainly comprising qualifying subordinated loan capital, related non-controlling interests and eligible collective impairment allowances

Value-at-Risk ('VaR'): A measure of the potential loss at a specified confidence level from adverse market movements in an ordinary market environment

Appendix 2 - CRR II references

CRR II ref.	Requirement summary	Compliance ref. applicable at 30 September 2023	Page ref.
Scope of disclosure requirements			
431 (1)	Institutions shall publish Pillar 3 disclosures.	1.3 Article 433/434 CRR II - Frequency, scope and means of disclosures	4
431 (2)	Firms with permission to use specific operational risk methodologies must disclose operational risk information.	N/A	N/A
431 (3)	The management body shall adopt formal policies to comply with the disclosure requirements. At least one member of the management body shall attest in writing.	Attestation Statement	2
431 (4)	Quantitative disclosures shall be accompanied by a qualitative narrative that may be necessary in order for the users of that information to understand the quantitative disclosures.	Qualitative narrative included where necessary.	N/A
431 (5)	Explanation of ratings decision upon request.	N/A	N/A
Non-material, proprietary or confidential information			
432 (1)	Institutions may omit disclosures if the information is not regarded as material (except Articles 435(2)(c), 437 and 450).	1.2 Article 432 CRR II - Non-material, proprietary or confidential information	4
432 (2)	Institutions may omit information that is proprietary or confidential if certain conditions are respected (except Articles 437 and 450).		
432 (3)	Where 432(1) and (2) apply this must be stated in the disclosures, and more general information must be disclosed.		
Frequency of disclosure			
433	Institutions shall publish the disclosures required at least on an annual basis, on the same date of the publication of the financial statements. Semi-annual and quarterly disclosures shall be published on the same date as the financial reports for the period where applicable.	1.3 Article 433/434 CRR II - Frequency, scope and means of disclosures	4
433 (a)	Large institutions shall disclose the information outlined in this article on an annual, semi-annual and quarterly basis as applicable.		
433 (b)	Small and non-complex institutions shall disclose the information outlined in this article on an annual and semi-annual basis as applicable.	N/A	N/A
433 (c)	Institutions that are not subject to Article 433(a) or 433(b) shall disclose the information outlined in this article on an annual and semi-annual basis as applicable.	N/A	N/A
Means of disclosure			
434 (1)	Institutions shall disclose all the information required under Titles II and III in electronic format and in a single medium or location.	1.3 Article 433/434 CRR II - Frequency, scope and means of disclosures	4
434 (2)	Institutions shall make available on their website an archive of the information required to be disclosed in accordance with this Part.	1.3 Article 433/434 CRR II - Frequency, scope and means of disclosures	4
Risk management objectives and policies			
435 (1)	Institutions shall disclose their risk management objectives and policies.	N/A under Article 433a(2)	N/A
435 (1) (a)	Strategies and processes to manage those categories of risks.		
435 (1) (b)	Structure and organisation of the risk management function.		
435 (1) (c)	Scope and nature of risk reporting and measurement systems.		
435 (1) (d)	Policies for hedging and mitigating risk.		
435 (1) (e)	Approved declaration on the adequacy of risk management arrangements.		
435 (1) (f)	Approved risk statement describing the overall risk profile associated with business strategy.		
435 (2) (a)	Number of directorships held by directors.	3.1 Board of Directors	14
435 (2) (b)	Recruitment policy of Board members, their experience and expertise.		
435 (2) (c)	Policy on diversity of Board membership and results against targets.		
435 (2) (d)	Disclosure of whether a dedicated risk committee is in place, and number of meetings in the year.	N/A under Article 433a(2)	N/A
435 (2) (e)	Description of information flow on risk to Board.		
Scope of application			
436 (a)	The name of the institution to which this Regulation applies.	1 Article 431 CRR II - Disclosure requirements and policies	3
436 (b)	A reconciliation between the consolidated financial statements prepared in accordance with the applicable accounting framework and the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation.	N/A - There are no differences in scope.	N/A
436 (c)	A breakdown of assets and liabilities of the consolidated financial statements prepared in accordance with the requirements on regulatory consolidation broken down by type of risk.	N/A under Article 433a(2)	N/A
436 (d)	A reconciliation identifying the main sources of differences between the carrying value amounts in the financial statements under the regulatory scope of consolidation, and the exposure amount used for regulatory purposes.		
436 (e)	For exposures from the trading book and the non-trading book adjusted in accordance with Article 34 and Article 105, a breakdown of the constituent elements of an institution's prudent valuation adjustment, by types of risk.		
436 (f)	Current or expected material impediment to the prompt transfer of own funds or to the repayment of liabilities between the parent undertaking and its subsidiaries.	N/A - No impediment exists.	N/A
436 (g)	Aggregate amount by which the actual own funds are less than required in all subsidiaries not included in the consolidation, and the name or names of those subsidiaries.	All entities in scope of consolidation are appropriately capitalised.	N/A
436 (h)	Where applicable, the circumstance under which use is made of the derogation referred to in Article 7 or the individual consolidation method laid down in Article 9.	N/A	N/A

<i>Own funds</i>			
437 (a)	Full reconciliation of Common Equity Tier 1 (CET1) items.	N/A under Article 433a(2)	N/A
437 (b)	Description of the main features of the CET1 and Additional Tier 1 and Tier 2 instruments.		
437 (c)	Full terms and conditions of all CET1, Additional Tier 1 and Tier 2 instruments.		
437 (d) (i)	Each prudent filter applied.		
437 (d) (ii)	Each deduction made.		
437 (d) (iii)	Items not deducted.		
437 (e)	Description of all restrictions applied to the calculation of Own Funds.	N/A - No restrictions apply.	
437 (f)	Explanation of the basis of calculating capital ratios using elements of Own Funds.	N/A - Capital ratios are calculated in accordance with CRR II.	
<i>Own funds and eligible liabilities</i>			
437a (a)	Institutions that are subject to Article 92a or 92b shall disclose the composition of their own funds and eligible liabilities, their maturity and their main features.	Table 3: EU ILAC Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs	12
437a (b)	The ranking of eligible liabilities in the creditor hierarchy.	N/A - Only applicable at individual disclosure level.	N/A
437a (c)	The total amount of each issuance of eligible liabilities instruments.	Table 3: EU ILAC Internal loss absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs	12
437a (d)	The total amount of excluded liabilities.		
<i>Own funds requirements and risk weighted exposure amounts</i>			
438 (a)	Summary of institution's approach to assessing adequacy of capital levels.	N/A under Article 433a(2)	N/A
438 (b)	The amount of the additional own funds requirements based on the supervisory review process.		
438 (c)	Result of ICAAP on demand from authorities.		
438 (d)	The total risk-weighted exposure amount and the corresponding total own funds requirement.		
438 (e)	The on- and off-balance-sheet exposures, the risk-weighted exposure amounts and associated expected losses for each category of specialised lending.		
438 (f)	The exposure value and the risk-weighted exposure amount of own funds instruments held in any insurance undertaking, reinsurance undertaking or insurance holding company that the institutions do not deduct from their own funds.		
438 (g)	The supplementary own funds requirement and the capital adequacy ratio of the financial conglomerate.	N/A	N/A
438 (h)	The variations in the risk-weighted exposure amounts of the current disclosure period compared to the immediately preceding disclosure period that result from the use of internal models, including an outline of the key drivers explaining those variations.	N/A	N/A
<i>Exposure to counterparty credit risk (CCR)</i>			
439 (a)	Description of process to assign internal capital and credit limits to CCR exposures.	N/A under Article 433a(2)	N/A
439 (b)	Discussion of process to secure collateral and establishing reserves.		
439 (c)	Discussion of management of wrong-way exposures.		
439 (d)	Disclosure of collateral to be provided (outflows) in the event of a ratings downgrade.		
439 (e)	The amount of segregated and unsegregated collateral received and posted.		
439 (f)	Exposure values before and after the effect of the credit risk mitigation of derivative transactions.		
439 (g)	Exposure values before and after the effect of the credit risk mitigation of securities financing transactions.		
439 (h)	The exposure values after credit risk mitigation effects and the associated risk exposures for credit valuation adjustment capital charge.		
439 (i)	Exposure value to central counterparties and the associated risk exposures.		
439 (j)	The notional amount and fair value of credit derivative transactions.		
439 (k)	Estimate of alpha, if applicable.		
439 (l)	Separately, the disclosures included in point (e) of Article 444 and point (g) of Article 452.		
439 (m)	For institutions using the methods set out in Sections 4 to 5 of Chapter 6 of Title II Part Three, the size of their on- and off-balance-sheet derivative business		
<i>Countercyclical capital buffers</i>			
440 (a)	Geographical distribution of the exposure amounts and risk-weighted exposure amounts of its credit exposure	N/A under Article 433a(2)	N/A
440 (b)	Amount of the institution specific countercyclical capital buffer.		
<i>Indicators of global systemic importance</i>			
441	Disclosure of the indicators of global systemic importance.	N/A	N/A
<i>Credit risk adjustments</i>			
442 (a)	Disclosure of bank's scope and definitions of past due and impaired.	N/A under Article 433a(2)	N/A
442 (b)	Approaches for calculating specific and general credit risk adjustments.		
442 (c)	Information on the amount and quality of performing, non-performing and forborne exposures for loans, debt securities and off-balance-sheet exposures.		
442 (d)	An ageing analysis of accounting past due exposures.		
442 (e)	The gross carrying amounts of both defaulted and non-defaulted exposures.		
442 (f)	Changes in the gross amount of defaulted on- and off-balance-sheet exposures.		
442 (g)	The breakdown of loans and debt securities by residual maturity.		

<i>Unencumbered assets</i>			
443	Institutions shall disclose information concerning their encumbered and unencumbered assets.	N/A under Article 433a(2)	N/A
<i>Use of ECAs</i>			
444 (a)	Names of the ECAs used in the calculation of Standardised Approach RWAs, and reasons for any changes.	N/A under Article 433a(2)	N/A
444 (b)	Exposure classes associated with each ECAI.		
444 (c)	Explanation of the process for translating external ratings into credit quality steps.	N/A - Translation and mapping is as per the guidance in Articles 135-141 of CRR II.	N/A
444 (d)	Mapping of external rating to credit quality steps.	N/A - Translation and mapping is as per the guidance in Articles 135-141 of CRR II.	N/A
444 (e)	Exposure value pre and post-credit risk mitigation, by credit quality step.	N/A under Article 433a(2)	N/A
<i>Exposure to market risk</i>			
445	Disclosure of position risk, large exposures exceeding limits, FX, settlement and commodities risk.	N/A under Article 433a(2)	N/A
<i>Operational risk management</i>			
446 (a)	The approaches for the assessment of own funds requirements for operation risk that the institution qualifies for.	N/A under Article 433a(2)	N/A
446 (b)	A description of the methodology set out in Article 312(2), including a discussion of the relevant internal and external factors considered in the institution's advanced measurement approach.	N/A	N/A
446 (c)	In the case of partial use, the scope and coverage of the different methodologies used.	N/A	N/A
<i>Key metrics</i>			
447 (a)	Composition of own funds and own funds requirements.	N/A under Article 433a(2)	N/A
447 (b)	The total risk exposure amount.		
447 (c)	Amount and composition of additional own funds.		
447 (d)	Combined buffer requirement which the institutions are required to hold.		
447 (e)	Leverage ratio and the total exposure measure.		
447 (f) (i)	Twelve months averages of the liquidity coverage ratio for each quarter.		
447 (f) (ii)	Twelve months averages of total liquid assets for each quarter.		
447 (f) (iii)	Twelve months averages of the liquidity outflows, inflows and net liquidity outflows for each quarter.		
447 (g) (i)	The net stable funding ratio at the end of each quarter		
447 (g) (ii)	The available stable funding at the end of each quarter		
447 (g) (iii)	The required stable funding at the end of each quarter		
447 (h)	Own funds and eligible liabilities ratios and their components, numerator and denominator	Table 3: EU ILAC Internal loss absorbing capacity; internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs	12
<i>Exposure to interest rate risk on positions not included in the trading book</i>			
448 (1) (a)	The changes in the economic value of equity calculated under supervisory shock scenarios.	N/A under Article 433a(2)	N/A
448 (1) (b)	The changes in the net interest income calculated under supervisory shock scenarios.		
448 (1) (c)	A description of key modelling and parametric assumptions.	N/A - Tests reflect the scenarios outlined in CRD V Article 98.5a	N/A
448 (1) (d)	An explanation of the significance of the risk measures.	N/A under Article 433a(2)	N/A
448 (1) (e) (i)	A description of the specific risk measures that are used to evaluate changes economic value of equity and net interest income.		
448 (1) (e) (ii)	A description of the key modelling and parametric assumptions used where they differ from the provisions of Article 448(1)(c).		
448 (1) (e) (iii)	A description of the interest rate shock scenarios used to estimate the interest rate risk		
448 (1) (e) (iv)	The effect of hedges against interest rate risks.		
448 (1) (e) (v)	An outline of how often the evaluation of the interest rate risk occurs.		
448 (1) (f)	The description of the overall risk management and mitigation strategies.		
448 (1) (g)	Average and longest repricing maturity assigned to non-maturity deposits.		
448 (2)	By way of derogation from paragraph 1 of this Article, the requirements set out in points (c) and (e)(i) to (e)(iv) of paragraph 1 shall not apply to institutions that use the standardised methodology or the simplified standardised methodology.		
<i>Exposures to securitisation positions</i>			
449 (a)	A description of the institution's securitisation and re-securitisation activities including risk management and investment objectives, their role and whether the institution uses STS, and the extent of credit risk transfers to third parties	N/A under Article 433a(2)	N/A
449 (b)	The type of risks they are exposed to in their securitisation and re-securitisation activities by level of seniority of the relevant securitisation positions providing a distinction between STS and non-STs positions		
449 (b) (i)	The risk retained in own-originated transactions		
449 (b) (ii)	The risk incurred in relation to transactions originated by third parties		
449 (c)	Their approaches for calculating the risk-weighted exposure amounts that they apply to their securitisation activities.		
449 (d)	A list of SSPEs, with a description of their types of exposures to those SSPEs, including derivative contracts:		

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449 (d) (i)	SSPEs which acquire exposures originated by the institutions.	N/A under Article 433a(2)	N/A
449 (d) (ii)	SSPEs sponsored by the institutions.		
449 (d) (iii)	SSPEs and other legal entities for which the institutions provide securitisation-related services		
449 (d) (iv)	SSPEs included in the institutions' regulatory scope of consolidation;		
449 (e)	A list of any legal entities in relation to which the institutions have disclosed that they have provided support in accordance with Chapter 5 of Title II of Part Three		
449 (f)	A list of legal entities affiliated with the institutions and that invest in securitisations originated by the institutions or in securitisation positions issued by SSPEs sponsored by the institutions.		
449 (g)	A summary of their accounting policies for securitisation activity, including where relevant a distinction between securitisation and re-securitisation positions.		
449 (h)	The names of the ECAIs used for securitisations and the types of exposure for which each agency is used.		
449 (i)	Where applicable, a description of the Internal Assessment Approach as set out in Chapter 5 of Title II of Part Three.		
449 (j)	Separately for the trading book and the non-trading book, the carrying amount of securitisation exposures.		
449 (k) (i)	For the non-trading book activities, the aggregate amount of securitisation positions where institutions act as originator or sponsor and the associated risk-weighted assets and capital requirements by regulatory approaches.		
449 (k) (ii)	The aggregate amount of securitisation positions where institutions act as investor and the associated riskweighted assets and capital requirements by regulatory approaches.		
449 (l)	For exposures securitised by the institution, the amount of exposures in default and the amount of the specific credit risk adjustments made by the institution during the current period, both broken down by exposure type.		
Environmental, social and governance risks (ESG risks)			
449a	Large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, shall disclose information on ESG risks, including physical risks and transition risks.	N/A - the European bank does not have securities admitted for trading in a member state.	N/A
Remuneration policy			
450 (1) (a)	Information concerning the decision-making process used for determining the remuneration policy.	N/A under Article 433a(2)	N/A
450 (1) (b)	Information about the link between pay of the staff and their performance.		
450 (1) (c)	Important design characteristics of the remuneration system.		
450 (1) (d)	The ratios between fixed and variable remuneration.		
450 (1) (e)	Information on the performance criteria on which the entitlement to shares, options or variable components of remuneration is based.		
450 (1) (f)	Main parameters and rationale for any variable component scheme and any other non-cash benefits.		
450 (1) (g)	Aggregate quantitative information on remuneration by business area.		
450 (1) (h)	Aggregate quantitative information on remuneration, broken down by senior staff management and members of staff whose actions have a material impact on the risk profile		
450 (1) (h) (i)			
450 (1) (h) (ii)			
450 (1) (h) (iii)			
450 (1) (h) (iv)			
450 (1) (h) (v)			
450 (1) (h) (vi)			
450 (1) (h) (vii)			
450 (1) (i)	Number of individuals that have been remunerated EUR 1 million or more per financial year.		
450 (1) (j)	Upon demand from the relevant Member State or competent authority, the total remuneration for each member of management or senior management.		
450 (1) (k)	Information on whether the institution benefits from a derogation laid down in Article 94(3) of Directive 2013/36/EU.		
450 (2)	For large institutions, quantitative information on the remuneration of the collective management body shall be made available to the public, differentiating between executive and non-executive members.		
Leverage ratio			
451 (1) (a)	Leverage ratio.	N/A under Article 433a(2)	N/A
451 (1) (b)	Breakdown of total exposure measure.		
451 (1) (c)	Where applicable, the amount of exposures calculated in accordance with Articles 429(8) and 429a(1) and the adjusted leverage ratio calculated in accordance with Article 429a(7);	N/A under Article 433a(2)	N/A
451 (1) (d)	Description of the process used to manage the risk of excessive leverage.		
451 (1) (e)	Description of the factors that had an impact on the leverage ratio.		
451 (2)	Public development credit institutions shall disclose the leverage ratio without the adjustment to the total exposure measure.		
451 (3)	Large institutions shall disclose the leverage ratio and the breakdown of the total exposure measure referred to in Article 429(4) based on averages calculated in accordance with the implementing act referred to in Article 430(7).		
Liquidity requirements			
451a (1)	Disclose information on liquidity coverage ratio, net stable funding ratio and liquidity risk management.	N/A under Article 433a(2)	N/A
451a (2) (a)	The average of their liquidity coverage ratio based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period.		

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451a (2) (b)	The average of total liquid assets based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period, and a description of the composition of that liquidity buffer.	N/A under Article 433a(2)	N/A
451a (2) (c)	The averages of liquidity outflows, inflows and net liquidity outflows, based on end-of-the-month observations over the preceding 12 months for each quarter of the relevant disclosure period and the description of their composition.		
451a (3) (a)	Quarter-end figures of the net stable funding ratio for each quarter of the relevant disclosure period.		
451a (3) (b)	An overview of the amount of available stable funding.		
451a (3) (c)	An overview of the amount of required stable funding.		
451a (4)	Disclosure of the arrangements, systems, processes and strategies put in place to identify, measure, manage and monitor liquidity risk.		
Use of the IRB approach to credit risk			
452 (a)	The competent authority's permission of the approach.	N/A	N/A
452 (b)	The mechanisms for rating systems at the different stages of development, controls and change.		
452 (c)	For each exposure class referred to in Article 147, the percentage of the total exposure value subject to the Standardised Approach or to the IRB approach.		
452 (d)	The role of the functions involved in the development, approval and subsequent changes of the credit risk models.		
452 (e)	The scope and main content of the reporting related to credit risk models.		
452 (f)	A description of the internal ratings process by exposure class, including the number of key models used and a brief discussion of the main differences between the models.		
452 (g)	As applicable, information relating to each exposure class referred to in Article 147.		
452 (h)	Institutions' estimates of PDs against the actual default rate for each class over a longer period.		
Use of credit risk mitigation techniques			
453 (a)	Use of on- and off-balance sheet netting.	N/A under Article 433a(2)	N/A
453 (b)	How collateral valuation is managed.		
453 (c)	Description of types of collateral used.		
453 (d)	Types of guarantor and credit derivative counterparty, and their creditworthiness.	N/A - BNY Mellon's EMEA entities do not enter into credit derivative transactions	N/A
453 (e)	Disclosure of market or credit risk concentrations within risk mitigation exposures.	N/A under Article 433a(2)	N/A
453 (f)	Under either the Standardised or IRB approach, disclose the exposure value not covered by any eligible credit protection and the total exposure valued covered by eligible credit protection.		
453 (g)	Conversion factors and the credit risk mitigation associated with the exposure and the incidence of credit risk mitigation techniques with and without substitution effect.		
453 (h)	Under the Standardised approach, the on- and off-balance-sheet exposure value by exposure class before and after conversion factors and any associated credit risk mitigation.		
453 (i)	Under the Standardised approach, the risk-weighted exposure amount and the ratio between that risk-weighted exposure amount and the exposure value after applying conversion factors and credit risk mitigation, for each exposure class.		
453 (j)	For risk-weighted exposure amounts under the IRB approach, the risk-weighted exposure amount before and after recognition of the credit risk mitigation impact of credit derivatives.	N/A	N/A
Use of the Advanced Measurement Approaches to operational risk			
454	Description of the use of insurance or other risk transfer mechanisms to mitigate operational risk.	N/A	N/A
Use of internal market risk models			
455	Institutions calculating their capital requirements using internal market risk models.	N/A	N/A



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