RCI BANQUE

RISKS – PILLAR III

December 31, 2019

STATEMENT ON INFORMATION PUBLISHED IN RESPECT OF PILLAR III

Senior management and the Board of Directors are responsible for implementing and maintaining an effective internal control organization overseeing the company's publications, including those issued in respect of the Pillar III report.

In that regard, we confirm, after taking all reasonable measures to that end, that the information reported at 31 December 2019 in respect of the RCI Banque Pillar III report has been subject to the same degree of internal control and same internal control procedures as other information provided as regards the financial report.

João Miguel Leandro
Chief Executive Officer

Clotilde Delbos
Chairman of the Board of Directors

INTRODUCTION

The following information concerns RCI Banque's risks and is provided to meet the disclosure requirements of Pillar III of the Basel Agreements, transposed into European law by means of Regulation (EU) 2013/575 (or CRR) and Directive 2013/36/ EU (or CRD IV).

It is published on a consolidated basis (Article 13 of the CRR) and meets the requirements set out in part 8 of the CRR (Articles 431 and seq.).

RCI Banque's Pillar III report is published annually as a whole, but certain important or faster changing items are disclosed half-yearly, or only on a transitional basis (Article 492 of the CRR). No material, proprietary or confidential information is omitted (Article 432 of the CRR).

Publication of the risk report is the responsibility of RCI Banque's Company Chief Risk Officer. The information contained in this report has been prepared in accordance with the Pillar III disclosure procedure validated by RCI Banque's Regulatory Committee.

I - SUMMARY OF RISKS

1 - KEY FIGURES

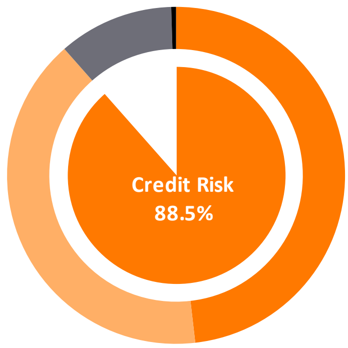
PRUDENTIAL RATIOS AND ROA

Prudential Ratios	
CET1 Solvency Ratio	15.27%
Leverage Ratio	8.90%
LCR - Aryhmetic Average of the past three months	247%

Return on assets (1)	1.6%

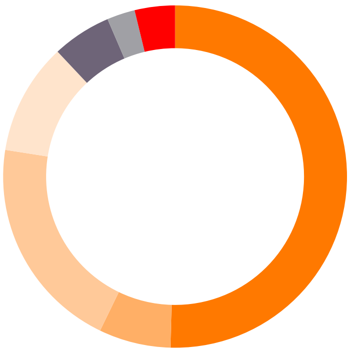
Own funds requirements by type of risk

- Credit Risk - Internal Ratings Based Approach 48.2%
- Credit Risk - Standard Approach 40.3%
- Operational Risk 11.0%
- Credit Valuation Adjustment Risk 0.5%
- Market Risk 0.0%



Exposure by exposure class

- Retail 50.4%
- Retail SME 6.8%
- Corporates 20.3%
- Corporates SME 10.5%
- Central Governments or Central Banks 5.6%
- Institutions 2.6%
- Equity 0.0%
- Other non-credit obligation assets 3.8%



2 - RISK FACTORS

The identification and monitoring of risks is an integral part of RCI Banque's approach to risk management. This approach may be observed through risk-weighted asset levels, but also through other indicators, work and analyses conducted by the Group's steering and risks functions.

In light of the diversity of the Group's business, the management of risks is built around the following major risk types.

- **Interest rate risks and foreign exchange risks**: risk of a drop in interest rate margin or in the value of the banking portfolio owing to a change in interest rates or foreign exchange rates.
- **Liquidity and funding cost risk**: liquidity risk occurs when RCI Banque is unable to honor its commitments or cannot finance the development of its business in line with its commercial objectives. Funding cost risk corresponds to the risk of RCI Banque not being in a position to finance its activities at a cost that is competitive.
- **Credit risk (Retail customers and Dealer networks)**: risk of losses resulting from customers' inability to meet their financial commitments.
- **Residual value risk**: risk to which the Group is exposed as a result of the depreciation in the net resale value of a vehicle at the end of the financing contract (value below initial estimate).
- **Strategic risk**: risk resulting from the Group's inability to implement its strategy and achieve its medium-term plan.
- **Concentration risk**: risk resulting from a concentration in RCI Banque's exposures (countries, sectors, debtors).
- **Operational risks**: risk of losses or sanctions resulting from ineffective or inadequate internal processes involving staff and/or IT systems (IT risks), or external events, whether deliberate, accidental or natural (Business interruption).
- **Non-compliance risks**: risk of legal, administrative or disciplinary sanctions, of significant financial loss or reputational damage, arising due to non-compliance with provisions specific to banking and financial activities (laws and regulations in force, ethics codes, national, European and international banking regulations). These risks include legal and conduct risks, tax risks, risks relating to money-laundering and the financing of terrorism (AML-CFT), risks associated with the protection of personal data, and risks of non-compliance with banking regulations.
- **Model risk**: risk associated with a failure in the models used by the Group in the course of its business. This notably relates to the use of inadequate price calculation, revaluation, hedging or risk management models. Failure of such models may be due to either the quality of the data used, the modeling technique or the implementation or use thereof.

The various risk types presented above are those identified at this time as being the most significant and typical for RCI Banque, and the materialization of which could have a major adverse effect on its operations, financial position, and/or performance. This is not an exhaustive list of the risks undertaken by the Group as part of its activities or in consideration of its environment.

II - GOVERNANCE AND ORGANIZATION PRINCIPLES OF RISK MANAGEMENT

1 - RISK GOVERNANCE POLICY - RISK APPETITE FRAMEWORK

RISK GOVERNANCE POLICY: KEY PRINCIPLES

The capacity to control actual or potential risks in its day-to- day activities, share the right information, take adequate measures in good time and promote responsible conduct at all levels of the company are key performance factors for the RCI group, and the pillars of its risk management mechanism.

Therefore, in accordance with the regulatory requirements (CRD IV/CRR), the RCI group's Risk Governance policy, adopted by General Management and the Board of Directors of RCI Bank and Services, is built around the following principles:

- Identifying the main risks that RCI Banque has to address, in light of its "business model", its strategy and the environment in which it operates;
- The Board of Directors determining and formally defining risk appetite and conscious of it when setting strategic and commercial objectives;
- Clarifying the roles of all parties involved in risk management and raising awareness amongst all managers about due compliance with Risk Governance Policy and with limits;
- Improving vertical and horizontal communication channels and reporting lines to ensure alerts escalation to the right level and timely treatment of any overruns of set risk limits;
- Risks are controlled by functions independent from operational functions.

The Risk Governance Policy applies to all consolidated entities in the RCI Group and is deployed at all levels of the organization, in each business line, for all risks and processes.

The list of risks identified in the group's mapping undergoes regular review (at least once a year), and any modifications thereto are subject to a prior consistency check with regard to the ICAAP/ILAAP standards. For its part, the risk appetite framework may be redefined and the control system strengthened whenever the risks of occurrence or seriousness of a risk appear greater.

Risk management guidelines are taken into account when drawing up each business plan and entail an examination of the related risks. This analysis is orchestrated by the Chief Risk Officer and forms an integral part of the plan submitted to the Board of Directors for approval.

The governing bodies (Executive Committee, Board of Directors' Risk Committee) ensure consistency and balance between:

- Business development strategy and commercial objectives, and
- Risk strategy and associated risk guidelines.

RCI Banque's Board of Directors confirms that the risk management systems in place are adequate to preserve the company's liquidity and solvency with regard to its strategy and its risk profile.

RISK APPETITE FRAMEWORK

The "RAF" ("Risk Appetite Framework") defined by the Board of Directors is the group's guiding line of conduct in the field of risk strategy, which lays down the principles and limits of RCI Banque's strategy to be followed within the company.

As part of this framework, "Risk Appetite" is defined for RCI Banque as the aggregate level and types of risks that the Board of Directors is willing to assume, in line with the company's risk capacity to achieve its strategic and commercial objectives.

At operational level, risk appetite is reflected by relevant limits and alert thresholds. The indicators, which may be qualitative and/or quantitative, used to set these limits, are in place for the company's major risks, as is the process of alert escalation up to the Board of Directors.

The RCI Board of Directors' Risk Committee ascertains the smooth running of this process, which is subject to a general review at least once a year. In parallel, the most critical risks are presented quarterly to the Board of Directors' Risk Committee.

2 - ORGANIZATION OF RISK CONTROL

The overall risk monitoring process at RCI is managed at three levels by distinct functions:

- **1st level controls** is done by:
  - the operational staff in charge of day-to-day risk management within their own area of responsibility. They decide on and are responsible for risk-taking within the operations they conduct to achieve goals assigned to them. They exercise such responsibility in compliance with the risk management rules and limits set by the "Corporate" risk steering functions;
  - the corporate functional departments in charge of risk definition, rules, management methods, measurement and monitoring at the corporate level. Each department, in its area of expertise, manages and oversees the risk management system via guidelines and country objectives. Risk is monitored by periodic dedicated committees in both the subsidiaries and centrally. These departments rely on local representatives for risk measurement and exposure monitoring and ensure that limits are respected at the group level.
- **2nd level controls comprises:**
  - the Internal Control department, who reports to the Chief Risk Officer, is responsible for directing the general internal control system for the entire Group. In terms of internal control supervision in the RCI Banque group subsidiaries, the Director of the Internal Control department is supported by Internal Controllers who report to him/her functionally. The Internal Controllers report hierarchically to the CEO of the subsidiary. Similarly, the Director of the Internal Control department is supported by employees within the central functions to manage the internal control supervision system within the RCI Banque group departments;
  - the Risk and Banking Regulation department, who reports to the chief Risk Officer, ensures the deployment of the Risk Governance Policy within the Group and ensures its consistency with the Risk Appetite Framework (RAF) defined by the Board of Directors; ensures the reliability of risk measurement indicators, the completeness of risk management systems for each risk and the effective exercise of such management; controls, more specifically, the effectiveness of the reporting and alert feedback channels from the subsidiaries to the corporate departments and prepares a summary report on the risks for the management bodies and the Risks Committee of the Board of Directors, as appropriate; verifies the adequacy of the corrective measures developed in the event of failures and their effective implementation by the management functions; plays a central role in monitoring the group's compliance with applicable prudential regulations.
- **3rd level controls** refers to the Internal Audit and Periodic Control function, which aims to provide RCI Banque's Board of Directors and General Management with an overview of the effective level of business operations' control and of the risk steering and management performed by the first two levels.

These three risk controlling lines report to the following committees:

- The Board of Directors and its specialist committees, including the Risk Committee and the Audit and Accounting Committee;
- The Executive Committee, notably via the Internal Control, Operational Risk and Ethics & Compliance Commitee ;
- The operational risk management committees within the company's functions (at local and central level).

The content of the information reported to the Board of Directors' Risk Committee is decided upon during meetings of the latter committee on the basis of proposals submitted by the Executive Board member concerned and the Chief Risk Officer. Exposure to each risk is measured at a frequency appropriate (from daily for risks such as the interest rate risk and monitoring of customer deposits, to monthly in general cases). These measurements are made at the individual entity level and then consolidated. The Risk and Banking Regulation department centralizes the production of the quarterly dashboard delivered to the Board of Directors' Risk Committee.

The risk management system covers all the macro processes of the RCI Banque group and includes the following tools:

- the list of main risks for the RCI Banque group for which a coordinator, a level of appetite, alert thresholds and limits (Risk Appetite Framework, or RAF) are defined. This list and the Risk Appetite Framework are updated at least once a year in line with the RCI Banque group's business model and strategy;
- the operational rules mapping deployed in all of the RCI Banque group's consolidated subsidiaries identifies operating risks and the ways in which they are controlled. This operational risk mapping is updated regularly by the functional departments, assessed annually by the process owners and is controlled by the first and second lines of defense;
- the incident collection database helps to identify malfunctions that correspond to predefined criteria and enables the corrective and preventive measures required to control risks to be put in place. This database is used for internal and regulatory reporting purposes. The system sets thresholds for immediately communicating incidents to Executive Committee, Board of Directors, the French Prudential Supervision and Resolution Authority (*Autorité de Contrôle Prudentiel et de Résolution - ACPR*) and the European Central Bank.

THE GOVERNING BODIES

THE BOARD OF DIRECTORS

Board of Directors members, like the executive directors, are appointed on the basis of their reputation, knowledge of the company's activity and lines of business, technical and general skills, and experience, acquired for some of them through their duties in the shareholding company.

In addition, they collectively have the knowledge, expertise and experience to understand all the company's activities, including the main risks to which it is exposed, the sales finance sector, the Renault-Nissan-Mitsubishi Alliance and the automotive industry.

They each devote the time and attention necessary to perform their duties, in accordance with current regulations limiting the number of appointments held.

The principles concerning the selection and appointment of directors, *de facto* managers and holders of key positions in the company are described in RCI Banque's Management Suitability Policy, approved by the Board of Directors on 8 February 2019.

The policy provides in particular a distinct preselection process according to position, a succession plan and an assessment by the Appointments Committee based on specified suitability criteria and taking into consideration a diversity policy for the Board of Directors.

III-1 Positions held by the members of RCI Banque's Board of Directors

Board of Directors as at 31 December 2019

	Position held in RCI Banque S.A	Number of other positions held inside Renault Group	Number of other positions held outside Renault Group
Clotilde Delbos	Chairman of the Board	2 non-executive positions 3 executive positions	1 non-executive position
Phlippe BUROS	Director of the Board	4 non-executive positions	
Laurent DAVID	Director of the Board		
Isabelle MAURY	Director of the Board		2 executive positions 1 non-executive position
Isabelle Landrot	Director of the Board	3 non-executive positions 1 executive positions	
João Miguel LEANDRO	Chief Executive Officer	6 non-executive positions	

Other members of the management body in its executive function at 31 December 2019

François GUIONNET	Deputy Chief Executive Officer and VP Territories and Performance	7 non-executive positions	1 executive position
Jean-Marc SAUGIER	Deputy Chief Executive Officer and VP Finance and Treasury	4 non-executive positions	1 executive position

At 31 December 2019, RCI Banque's Board of Directors had five members, of which three females.

On recommendation by the Nominations Committee, the Board of Directors has set a diversity policy consisting in particular of maintaining a minimum proportion of 40% of directors of each sex.

As part of its oversight remit, in order to guarantee effective and prudential management of the establishment, the Board of Directors determines RCI's risk profile in line with set strategic objectives, gives executive directors and the Executive Committee guidance on risk management for implementation/adaptation within the group, and supervises implementation thereof.

To that end, RCI Banque's Board of Directors relies on specialist committees:

- **The Risk Committee**

The Risk Committee meets four times a year. Its role includes examining the risk map and signing off on the definition of risks, and analyzing and authorizing RCI group risk limits in line with the Board's risk appetite and with a view to assisting the Board in terms of oversight. It is also responsible for analyzing action plans in the event that limits or notification thresholds are exceeded, and for examining pricing systems for products and services. In parallel with the remuneration Committee, it also has the task of examining whether the remuneration policy is compatible with the Company's risk exposure. So that it can advise the Board of Directors, this Committee is also responsible for the analysis and approval of the internal control report, the ICAAP and ILAAP systems, the recovery plan, and significant aspects of the rating and estimating processes derived from the Company's internal credit risk models.

- **The Accounts and Audit Committee**

The Accounts and Audit Committee meets three times a year. It is responsible for preparing, presenting and monitoring the financial statements, overseeing the statutory audit of the separate and consolidated financial statements, monitoring the independence of the statutory auditors and the definition of their non-auditing services, recommending the appointment of the statutory auditors and monitoring their rotation, verifying the effectiveness of internal control and risk management systems, reviewing the audit plan, analyzing the audits carried out and reviewing investments in unconsolidated companies.

- **The Remunerations Committee**

The Remunerations Committee meets at least twice a year. Its main task is the annual review of the remuneration policy of management body and Chief Risk Officer. It also prepares decisions for the Board of Directors regarding the remuneration of individuals with an impact on risk and risk management.

- **The Nominations Committee**

The Nominations Committee meets at least twice a year. Its main task is to recommend members for the Board of Directors. It is also in charge of the annual review of the Board of Directors, including its structure, membership, gender diversity and breadth of directors' knowledge, skills and experience. It submits nominations to the Board for Executive Directors, the Chief Executive Officer, Deputy Chief Executive Officers, Chief Risk Officer and Chief Compliance Officer;

SENIOR MANAGEMENT

Managerial systems

In accordance with the CRD IV application order and 3 November decree on internal control, the duties of the Chairman and Chief Executive Officer are separate.

As of 31 December 2019, the company's Senior Management and *de facto* managers (within the meaning of Article L.511-13 of France's Monetary and Financial Code) are assumed under the responsibility of João Miguel Leandro, Chief Executive Officer, François Guionnet, Deputy Chief Executive Officer and V.P. Territories and Performance Division, and Jean-Marc Saugier, Deputy Chief Executive Officer and V.P. Finance and Treasury.

The Chief Executive Officer holds the broadest powers to act under any circumstances on the company's behalf, within the limits of the corporate object and conditional on those powers that the law expressly attributes to shareholders' meetings and the Board of Directors. He is authorized to grant sub delegations or substitutions of powers for one or more specific transactions or categories of transaction.

The Deputies Chief Executive Officer hold, as regards third parties, the same powers as the Chief Executive Officer.

The executive committee

RCI Banque's Executive Committee contributes to the Group's direction of policy and strategy. It is the reference body which approve action plans when alert thresholds or limits are exceeded. It is also the body that makes trade-off decisions in case when risk reduction measures affect other company objectives. The Executive Committee oversees the activity and risks in accordance with the guidelines ("Risk Appetite Framework") laid down by the Board of Directors via the Risk Committee.

In addition, Senior Management relies in particular on the following committees to manage the Group's risk control:

- the Financial Committee which reviews the following themes: economic analyses and forecasts, cost of the resource, liquidity risk, rate risk and counterparty risk on the Group's various perimeters and subsidiaries. Changes in RCI Holding's balance sheet and profit & loss account are also analyzed to make necessary adjustments to intra-Group transfer prices,
- the Capital and Liquidity Committee which steers the funding plan and ensures that the Group's solvency level enables it to ensure its development while meeting the expectations of the various stakeholders (regulators, rating agencies, investors, shareholder) and maintaining good resilience to stress scenarios,
- the Credit Committee which validates commitments beyond the authority of subsidiaries and of the Group's Head of commitments,
- the Performance Committee for "Retail and Wholesale Risks" aspects. It assesses the quality of customer production and subsidiaries' performance as regards recovery and targets. On dealer network activity, it reviews changes in outstandings and stock rotation indicators as well as changes in the classification of dealerships and outstandings,
- the Regulatory Committee which reviews major changes in regulations, prudential oversight and action plans, and validates internal rating models and the associated management system,
- the Internal Control, Operational Risk and Ethics & Compliance Committee manages the whole of the Group's internal control system, checks its quality and related mechanisms and adapts resources, systems and procedures. It details, runs and monitors the principles of the operational risk management policy and the principles of the compliance monitoring system. It monitors changes in action plans. An Internal Control, Operational Risks and Compliance Committee operates in RCI Banque group subsidiaries.
- the New Product Committee which validates new products before they are put on the market, ensuring in particular that new products comply with the Group's commercial policy, the Group's budgetary requirements, legislation applicable locally, and the Group's risk governance.

At local level, the dedicated committees control the operational management of risks in line with the defined framework.

3 - RISK PROFILE - RISK APPETITE STATEMENT

The risk profile is determined on the basis of all risks inherent in RCI Banque's activities in Europe and worldwide. These are identified in the group's risk mapping and are regularly assessed.

The risk profile is taken into account when working out and implementing rules on managing the said risks, more particularly to steer decision-making on risks in line with the Board of Directors' risk appetite level and RCI group strategy.

The risk profile is monitored through indicators and limits tracked once a quarter in the risk dashboard presented to the Board of Directors' Risk Committee. In the event that the set limits are overrun, a specific action plan is put in place. In more exceptional cases, and particularly under the strategic plan, adjustments may be made to the risk appetite framework, albeit without calling into question RCI's overall risk profile.

RCI Banque aims to support the business development of the Renault-Nissan-Mitsubishi Alliance's car brands, in particular through its key role in financing dealership networks and in developing customer loyalty. This is reflected in:

- Maintaining high levels of profitability and adequate solvency, which is the guarantee of the reliability of this commitment vis-à-vis the shareholder;
- A refinancing policy based on diversifying funding sources and on building up adequate liquidity reserves;
- Developing multichannel financing and services offers that ensure a continuing relationship with customers, to meet their expectations and that enhance the group's public image.

A responsible and measured approach is in the center of a risk-taking decision process at RCI. The main risks are subject to a strict risk steering framework, in line with the risk appetite defined by the Board of Directors:

- The **solvency risk** is controlled with a view to maintaining:
  a) a necessary security margin regarding prudential requirements, to reflect RCI high levels of profitability and capacity to adapt dividend paid to the single shareholder;
  b) and an "investment grade" rating level by credit rating agencies;
- The **liquidity risk** is assessed and controlled daily. It is managed in such a way as to ensure the company's continuity of business for a minimum period in various stress scenarios, including assumptions of financial market closure and mass withdrawals of deposits. A limit of 6 months' business continuity has been set for centrally funded subsidiaries (3 months for locally funded subsidiaries), with the associated alert thresholds set considerably over such levels.

- The **credit risk**:
  a) The **retail and corporate customer** risk is monitored from both the portfolio and new business perspectives. Its management is based on tracking the cost of risk in relation to set targets;
  b) The **wholesale** risk is controlled by monitoring the financial situation of dealers, thus contributing to the control of credit risk on outstandings, while ensuring the sustainability of dealer networks;

For both these risks, the target is to keep the overall cost of risk at a consolidated level below or equal to 1% of outstandings.

- The **interest-rate risk** is monitored daily and controlled by a sensitivity limit of €50m if interest rate variation exceeds 100 basis points (parallel shift of the yield curve) or a rotation of more than 50 basis points around 2 years;
- **Operational risks** including risks of non-compliance (legal, tax, AML-CFT, fraud, reputational, IT, personal data protection, etc.) are covered by a relevant risk mapping, specific procedures and controls, and are subject to monitoring by dedicated committees. Reporting at Board of Directors' Risk Committee and/or Executive Board level ensures compliance with alert thresholds and limits, set in order to minimize any risk of penalties or harm to the company's image and reputation.

4 - STRESS TESTS

Stress tests or what-if analyses are a favored measurement of the resilience of the group, its activities and portfolios, and form an integral part of its risk management. Stress tests are based on hypothetical, harsh yet plausible economic scenarios.

The stress tests process includes:

- An overall annual stress exercise as part of the ICAAP process (Internal Capital Adequacy Assessment Process). It covers all of the group's activities and in 2019 was based on four main scenarios: a central scenario based on the budget trajectory, a macro-economic stress scenario, and two internal stress scenarios to which a combined scenario was added. Projections of potential losses in respect of the establishment's risks are estimated over a three-year period;
- Liquidity stress tests ensure that the time frame in which the group can continue to operate is assured in a stressed market environment.
- Stress tests capturing the group's sensitivity to interest rate and foreign exchange risks. Interest rate risk is measured with the aid of yield curve translation and distortion scenarios.
- Stress tests designed by the EBA (European Banking Authority) or conducted within the supervisory framework of the ECB (European Central Bank) on the basis of a methodology common to the participating banks.

5 - REMUNERATION POLICY

The remuneration policy for individuals whose professional activities have a significant impact on RCI Banque's risk profile is presented to and approved by the Remuneration Committee and the Board of Directors.

The Remuneration Committee met two times in 2019. As at 31 December 2019, the members of the Remuneration Committee were C. Delbos, P. Buros and I. Landrot.

The fixed component of pay reflects the level of responsibility of the position held.

The variable component of the pay is intended to reward the performance achieved. This variable component depends heavily on the consolidated financial and commercial results achieved by the RCI Banque group.

The variable component of remuneration is capped at a percentage of the fixed salary. This percentage is always lower than 100%, so RCI Banque complies with regulations on variable remuneration.

The criteria used to measure performance are the group's consolidated operating margin, the sales margin on new financing and services contracts, measured per country and on a consolidated basis, the operating ratio, the actions dashboard and the individual contribution assessed by the employee's line manager. The operating margin, which is affected by the risks to which RCI Banque is exposed, is a key factor in the variable pay system. If the targeted operating margin is not achieved, the ceiling on the variable pay distributed is materially reduced.

If on the other hand this target is achieved, the sales performance is factored in. The above parameters have been selected to a/ reward achievement of sales targets, and b/ to factor in the financial result, which incorporates all costs borne by the company and in particular those related to risks taken.

In 2019, 87 individuals had significant impact on the risk profile. Their fixed pay for 2019 came to a total of 10,687,370 euros. Their variable pay for 2019 totaled 2,819,668 euros, representing 26.38% of total fixed salary, and to 20.88% of aggregate fixed and variable salaries.

RCI Banque’s activities relate exclusively to car finance and services. It is a field of business in which sub-fields of business have no significant differences. In addition, remuneration policy is the same across the whole RCI Banque perimeter. Consequently, it is not necessary to break down these amounts per field of business.

According to the type of position, this remunerations breaks down as follows:

- Executive Committee: total fixed remuneration= €1,466,609; total variable remuneration = €497,899
- Controls functions: total fixed remuneration = €931,671 ; total variable remuneration = €129,984
- Corporate functions excluding Executive Committee and control: total fixed remuneration = €1,347,665 ; total variable remuneration = €528,300
- Other positions: total fixed remuneration = €6,941,425 ; total variable remuneration = €1,663,485

In 2019, the members of RCI Banque's Board of Directors did not receive remuneration for their duties.

No employee receives an annual salary of more than 1,000,000 euros.

RCI Banque does not award shares or stock options.

Part of the variable pay awarded to individuals whose professional activities have a significant impact on RCI Banque's risk profile is deferred over a three-year period beyond the first payment, which is itself made at the end of the baseline financial year.

This policy of spreading the variable component of pay over a certain number of years was introduced by RCI Banque from the 2016 financial year onwards, with its first implementation at the end of that financial year, in early 2017.

Pursuant to Directive 2013/36/EU and in view of the principle of proportionality, RCI Banque has decided that:

- The policy of spreading variable remuneration over a certain number of years shall only apply to beneficiaries eligible for variable remuneration of more than 50,000 euros
- Depending on the amount of variable remuneration for which the beneficiary is eligible, the following rules shall apply:
    - From 50,001 euros to 83,300 euros: the amount of variable remuneration over and above 50,000 euros to which the beneficiary is entitled shall be deferred over a three-year period
    - Over 83,300 euros: 40% of the variable remuneration shall be deferred over a three-year period
- One third of the deferred amount may be released in each of the three years in that period provided that RCI Banque has achieved a certain level of Pre-Tax Income, expressed as a percentage of average performing outstandings
- Likewise, for the 2016 and 2017 financial years, the amount paid up over each of the 3 years of deferred is paid 50% in cash and 50% by payment of funds into a Subordinate Term Account.
- On the other hand, as from the 2018 financial year, the amount paid up over each of the 3 years of deferred is paid in full by the payment of funds into a Subordinate Term Account. This adjustment of the arrangement, intended to simplify it, was enacted by the Remunerations Committee at its meeting on 25 June 2018.

In the event that a serious event affecting RCI Banque's solvency occurs, in accordance with current legislation and regulations, the beneficiary may see the value of the funds allocated to the Subordinated Term Account reduced to zero and the related remuneration definitively lost. In such an event therefore, withdrawal of funds at the end of the retention period is impossible, and no remuneration will be payable.

The Subordinated Term Account shall be fully deleted and its repayment value reduced to zero should any of the following events occur:

- If the CET1 solvency ratio, defined according to the terms of Article 92 (1) (a) of the CRR, is less than 7%;
- If the banking regulator starts resolution proceedings against RCI Banque.

Lastly, if the beneficiary is the subject of an investigation and/or disciplinary proceedings into a potential breach or action or misconduct that could have impacted directly or indirectly on RCI Banque's Pre-Tax Income or Operating Margin, or that might indicate a lack of fitness or propriety, allocation of the deferred amount shall be suspended until such time as the findings of the investigation or disciplinary proceedings are known. If no breach or misconduct is identified and no sanctions imposed, the beneficiary's eligibility for the deferred remuneration will be maintained. If a breach or misconduct is identified and sanctions imposed, then the beneficiary will no longer be eligible for that deferred remuneration.

Thus, in light of the RCI Banque group's internal organization and the nature, scope and low complexity of its activities, RCI Banque has put in place a remuneration policy that guarantees a principle of deferred and conditional payment for individuals whose professional activities have a significant impact on the risk profile. This principle will be re-assessed on a regular basis in the event that exposure to risks changes.

At end 2019, in application of the above provisions, the deferred remuneration situation is as follows:

- For the 2016 financial year, deferred amounts determined in 2017 represented a total deferred of 313,017 euros, spread over 2018, 2019 and 2020. Of that total, amounts that could be paid in 2018 and 2019 conditional on confirmation were paid in full and represent a sub-total of 208,678 euros. The amount that remain deferred for the 2016 financial year for 2020 is 104,339 euros.
- For the 2017 financial year, amounts determined in 2018 represented a total deferred of 453,194 euros, spread over 2019, 2020 and 2021. Of that total, amounts that could be paid in 2019 conditional on confirmation were paid in full and represent a sub-total of 151,065 euros. The amount that remain deferred for the 2017 financial year for 2020 and 2021 is 302,129 euros.
- For the 2018 financial year, amounts determined in 2019 represented a total deferred of 511,589 euros, spread over 2020, 2021 and 2022.
- Thus, at end 2019, for the whole of the 2016, 2017 and 2018 financial years, amounts deferred for 2020 to 2022 represent a total of 918,057 euros.

During the 2019 financial year, among the people whose work has a significant impact on RCI Banque's risk profile, two persons benefitted from a golden hello, for a total amount of 70,000 euros.

Additionally, of the people whose work has a significant impact on RCI Banque's risk profile, one people received a golden handshake in 2019, for an amount of 478,461 euros.

III - CAPITAL MANAGEMENT AND CAPITAL ADEQUACY

1 - APPLICABILITY - PRUDENTIAL SCOPE

The prudential scope used to calculate the solvency ratio is the scope of consolidation described in the IFRS notes to the financial statements, with the exception of the exemptions described below in respect of CRR prudential consolidation methods.

RCI Banque has not opted for the so-called “conglomerates” option; therefore the solvency ratio is calculated “exclusive of insurance”, eliminating the group insurance companies' contributions from the numerator and the denominator.

Exemptions in respect of chapter 2 section 2 of the CRR (regulatory consolidation):

Insurance companies based in Malta are recognized by the equity method, in accordance with Article 18.5 of the CRR.

Furthermore, entities consolidated for accounting purposes by the proportional consolidation method before application of IFRS 11 and now deemed consolidated for accounting purposes by the equity method, remain prudentially consolidated by the proportional consolidation method in accordance with Article 18.4 of the CRR. Information on these entities and their consolidation method for accounting purposes is presented in note 8 to the consolidated financial statements.

With regard to liquidity ratios, only entities fully consolidated within the prudential scope are retained, in accordance with Article 18.1 of the CRR.

The main difference between the two scopes is explained by the change in consolidation method for the Turkish entity, recognized by the equity method for accounting purposes and by the proportional consolidation method for regulatory purposes, as well as by the group's insurance companies, which are fully consolidated for accounting purposes but recognized by the equity method for regulatory purposes.

IIII-1 LI1 - Differences between accounting and regulatory scopes of consolidation and mapping of financial statement categories with regulatory risk categories

In millions of euros	Carrying values in published financial statements	Carrying values under scope of regulatory consolidation	Carrying values of items subject to :				
			Credit risk framework	Counterparty credit risk framework	Securitisation framework	Market risk framework	Not subject or deduction from capital
Assets							
Cash and balances at central banks	1 527	1 527	1 527				
Derivatives	177	177		177			
Financial assets at fair value through other comprehensive income	1 364	1 180	1 180				
Financial assets at fair value through profit or loss	105	105	105				
Financial assets at amortised cost							
Amounts receivable from credit institutions	1 279	1 250	1 250				
Loans and advances to customers	50 582	50 748	50 808				-60
Held-to-maturity financial assets							
Current tax assets	261	16	16				
Deferred tax assets	171	131	10				121
Adjustment accounts & miscellaneous assets	1 069	1 105	1 105				
Non-current assets held for sale							
Investments in associates and joint ventures	142	217	217				
Operating lease transactions	1 227	1 227	1 227				
Tangible and intangible non-current assets	92	92	85				6
Goodwill	84	84					84
Total assets	**58 080**	**57 859**	**57 530**	**177**			**152**
Liabilities							
Central Banks	2 700	2 700					2 700
Derivatives	92	92		4			88
Financial liabilities at fair value through profit or loss							
Amounts payable to credit institutions	2 780	2 780					2 780
Amounts payable to customers	18 605	**19 029**	21				19 008
Debt securities	24 016	24 016					24 016
Current tax liabilities	162	70					70
Deferred tax liabilities	588	587					587
Adjustment accounts & miscellaneous liabilities	1 895	1 827					1 827
Non-current liabilities held for sale							
Provisions	185	186					186
Insurance technical provisions	488						
Subordinated debt - Liabilities	867	867					867
Equity	5 702	5 702					5 702
Total liabilities	**58 080**	**57 859**	**21**	**4**			**57 834**

IIII-2 LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

In millions of euros	Total	Items subject to :			
		Credit risk framework	Counterparty credit risk framework	Securitisation framework	Market risk framework
Asset carrying value amount under scope of regulatory consolidation	57 707	57 530	177		
Liabilities carrying value amount under regulatory scope of consolidation	25	21	4		
Total net amount under regulatory scope of consolidation	**57 682**	**57 509**	**173**		
Off-balance sheet amounts	2 237	2 237			
Differences in valuations	164	67	97		
Differences due to different netting rules, other than those already included in row 2	-889	-889			
Differences due to consideration of provisions	623	623			
Differences due to prudential filters					
Exposure amounts considered for regulatory purposes	**59 817**	**59 547**	**270**		

IIII-3 LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	
RCI Financial Services B.V.	Full consolidation	X				Finance and services company
RCI Finance S.A.	Full consolidation	X				Credit institution
RCI Versicherungs-Service GmbH	Full consolidation	X				Insurance Brokers
Courtage S.A.	Full consolidation	X				Insurance Brokers
RCI Financial Services Ltd	Full consolidation	X				Credit institution
RCI Leasing Romania IFN S.A.	Full consolidation	X				Credit institution
RCI Zrt	Full consolidation	X				Credit institution
RCI Finance Maroc S.A.	Full consolidation	X				Credit institution
OOO RN Finance Rus	Full consolidation	X				Finance and services company
RDFM S.A.R.L	Full consolidation	X				Insurance Brokers
RCI Broker de asigurare S.R.L.	Full consolidation	X				Insurance Brokers
RCI Finance C.Z., S.r.o.	Full consolidation	X				Finance and services company
RCI Financial Services Korea Co. Ltd	Full consolidation	X				Credit institution
RCI Gest Seguros - Mediadores de Seguros Lda	Full consolidation	X				Insurance Brokers
RCI Finantare Romania S.r.l.	Full consolidation	X				Finance and services company
Corretora de Seguros RCI Brasil S.A.	Full consolidation	X				Insurance Brokers

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	
Banco RCI Brasil S.A.	Full consolidation	X				Credit institution
Rombo Compania Financiera S.A.	Full consolidation	X				Credit institution
Diac Location S.A.	Full consolidation	X				Finance and services company
RCI Banque S.A.	Full consolidation	X				Credit institution
RCI Banque S.A. Niederlassung Deutschland	Full consolidation	X				Credit institution
RCI Banque S.A. Succursale Italiana	Full consolidation	X				Credit institution
RCI Banque Sucursal Argentina	Full consolidation	X				Credit institution
RCI Banque S.A. Sucursal Portugal	Full consolidation	X				Credit institution
RCI BANQUE S.A. Bančna podružnica Ljubljana	Full consolidation	X				Credit institution
Rci Banque S.A. Sucursal En España	Full consolidation	X				Credit institution
Renault Finance Nordic Bankfilial till RCI Banque S.A., Frankrike	Full consolidation	X				Credit institution
RCI Banque S.A. Niederlassung Österreich	Full consolidation	X				Credit institution
RCI Banque, Branch Ireland	Full consolidation	X				Credit institution
RCI Banque Spólka Akcyjna Oddzial w Polsce	Full consolidation	X				Credit institution
RCI Bank UK	Full consolidation	X				Credit institution
Diac S.A.	Full consolidation	X				Credit institution
Autofin S.A.	Full consolidation	X				Finance and services company
RCI Financial Services S.A.	Full consolidation	X				Finance and services company
RCI Leasing Polska Sp. z o.o.	Full consolidation	X				Finance and services company
RCI Financial Services, S.r.o.	Full consolidation	X				Finance and services company
Renault Crédit Car S.A.	Equity method			X		Finance and services company
Administradora de Consórcio RCI Brasil Ltda	Full consolidation	X				Credit institution
Overlease S.A.	Full consolidation	X				Finance and services company
RCI Services Ltd	Full consolidation			X		Insurance Company
RCI Insurance Ltd	Full consolidation			X		Insurance Company
RCI Life Ltd	Full consolidation			X		Insurance Company
ES Mobility S.R.L.	Full consolidation	X				Finance and services company
ORFIN Finansman Anonim Sirketi	Equity method		X			Credit institution
RN SF BV	Equity method			X		Credit institution
RCI Services Algérie S.A.R.L.	Not consolidated			X		Finance and services company
RCI Financial Services Ukraine LLC	Not consolidated			X		Finance and services company
RCI Finance SK S.r.o.	Not consolidated			X		Finance and services company
RCI Servicios Colombia S.A.	Full consolidation			X		Finance and services company
RCI Usluge d.o.o	Not consolidated			X		Finance and services company
Overlease in Liquidazione S.R.L.	Not consolidated			X		Finance and services company
RCI Services, d.o.o.	Not consolidated			X		Finance and services company

Name of the entity	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Neither consolidated nor deducted	Deducted	
ORF Kiralama Pazarlama ve Pazarlama Danismanligi A.S.	Not consolidated			X		Finance and services company
RCI Brasil Serviços e Participações Ltda	Full consolidation			X		Finance and services company
RCI Services KFT	Not consolidated			X		Finance and services company
RCI Insurance Service Korea Co. Ltd	Not consolidated			X		Insurance Brokers
Nissan Renault Financial Services India Private Limited	Equity method			X		Finance and services company
RCI Lizing d.o.o.	Not consolidated			X		Credit institution
RCI Colombia S.A. Compania de Financiamiento	Full consolidation	X				Credit institution
Bulb Software Ltd	Not consolidated			X		Comercial society
RCI COM SA	Full consolidation	X				Comercial society
RCI Bank Uk Limited	Full consolidation	X				Credit institution

2 - SOLVENCY RATIO

SOLVENCY RATIO (OWN FUNDS AND REQUIREMENTS)

In September 2007 the French Prudential Supervision and Resolution Authority granted RCI Banque individual exemptions from solvency ratio compliance for French credit institutions Diac SA and RCI Banque S.A., as the exemption conditions imposed by Article 4.1 of CRBF regulation 2000-03 were met by the group.

The switch to Directive 2013/36/EU (CRD IV) does not call into question the individual exemptions granted by the French Prudential Supervision and Resolution Authority before 1st January 2014, on the basis of previous regulatory provisions.

RCI Banque still complies with the framework of requirements provided in Article 7.3 of the CRR:

- There is no impediment to the transfer of own funds between subsidiaries;
- The risk measuring and control systems within the meaning of the ministerial order of 3 November 2014 on internal control are implemented on a consolidated basis, subsidiaries included.

Accordingly, the RCI Banque group is exempted from compliance on an individual basis with the solvency ratio for each of its French finance companies. However, it monitors changes in this ratio at group consolidated level every month.

The overall "Pillar I" solvency ratio came to 17.73 % at 31 December 2019 (of which Core Tier one was 15.27%) against 15.48% at 31 December 2018 (of which Core Tier one was 15.46%). These ratios include profit for 2019, net of interim dividends that RCI Banque paid to its shareholder. RCI Banque, in line with ECB recommendations following the COVID-19 crisis, has not planned to pay any further dividend relative to the financial year, in accordance with Article 26.2 of the CRR and the terms of decision BCE 2015/4. Compared to December 2018, the increase in the solvency ratio is due to a €1,262M increase in own equity (of which 850M€ of T2), partially offset by a €3,093 M increase in weighted risks. The T2 issuance strengthens RCI Banque regulatory capital in anticipation of the expected recalibration of the parameters of our internal models following the reviews conducted by the ECB[1] and the application of EBA Guidelines on the definition of defaulted receivables.

Prudential own funds are determined in accordance with Regulation (EU) 575/2013 concerning prudential requirements applying to credit institutions and investment firms (CRR).

[1] On the models for which RCI Banque has received a draft decision letter following ECB inspections on internal models (TRIMIX or IMI), the negative impacts on solvency ratio are estimated at 1.20% including temporary add-ons impacts. Additional negative impacts could occur on models for which ECB conclusions have not been received yet.

At end-December 2019, RCI Banque must apply the following capital buffers:

- A capital conservation buffer of 2.5% of total risk-weighted exposures;
- A countercyclical capital buffer applied to some countries as described in CCC1 table below.

Notification by the ECB of the Supervisory Review and Evaluation Process (SREP) decision

At the end of the year 2019, the European Central Bank has notified to RCI Banque its decision regarding the level of additional capital requirement under Pillar 2 (P2R - "Pillar 2 Requirement"). It is set for 2020 at 2%, applicable from 1st January 2020.

Minimum requirement for own funds and eligible liabilities (MREL)

RCI Banque has received the notification from the Single Resolution Board (SRB) of its binding minimum requirement for own funds and eligible liabilities (MREL). This MREL requirement has been set at 7.35% of the total liabilities and own funds (TLOF). This is equivalent to 12.27% of RCI Banque’s risk weighted assets (RWA) and has been calibrated based on 2017 Overall Capital Requirement. As of today, RCI Banque already complies with this MREL requirement. Future requirements will be subject to ongoing review.

IIII-4 CCC1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

In Millions of euros	General credit exposures		Trading book exposure		Securitisation exposure		Own funds requirements				Own funds requirement weights	Countercyclical capital buffer rate
	Exposure value for SA	Exposure value IRB	Sum of long and short position of trading book	Value of trading book exposure for internal models	Exposure value for SA	Exposure value for IRB	Of which: General credit exposures	Of which: Trading book exposures	Of which: Securitisation exposures	Total		
Breakdown by country												
Argentina	208						19			19	0.01	
Austria	687						48			48	0.02	
Belgium	554						44			44	0.02	
Brazil	2 426						158			158	0.07	
Swiss	880						61			61	0.03	
Czech Republic	224						14			14	0.01	1.50%
Germany	502	8 456					202			202	0.08	
Spain	502	4 505					184			184	0.08	
France	1 946	15 659					718			718	0.30	0.25%
Great-Britain	677	4 404					206			206	0.09	1.00%
Hungary	64						5			5	0.00	
Ireland	486						33			33	0.01	1.00%
India	33						7			7	0.00	
Italy	710	5 976					284			284	0.12	
South Korea	46	1 620					47			47	0.02	
Luxembourg	70						6			6	0.00	
Morocco	597						42			42	0.02	
Malta	100						20			20	0.01	
Netherlands	891						71			71	0.03	
Norway	3											2.50%
Poland	880						54			54	0.02	
Portugal	903						67			67	0.03	
Romania	337						24			24	0.01	
Russia												
Sweden	257						21			21	0.01	2.50%
Slovenia	288						19			19	0.01	
Slovakia	31						3			3	0.00	1.50%
Turkey	153						8			8	0.00	
United States												
Colombia	555						34			34	0.01	
Croatia	4						0			0	0.00	
Other countries												
Total all countries	**15 011**	**40 620**					**2 397**			**2 397**	**1.00**	**0.21%**

In accordance with the method used to calculate the countercyclical capital buffer, only the own funds requirements stipulated under Article 140(4) of CRD IV are included.

IIII-5 CCC2 - Amount of institution-specific countercyclical capital buffer

In Millions of euros	Amounts
Total risk exposure amount	34 915
Institution specific countercyclical buffer rate	0.21%
Institution specific countercyclical buffer requirement	72

RCI Banque is not subject to the buffer required for systemically important institutions (Article 131 of the CRD IV), nor to the systemic risk requirement (Article 133 of the CRD IV).

3 - OWN FUNDS

COMMON EQUITY TIER ONE ("CET 1")

Common equity Tier 1 capital comprises share capital and the related share premiums, reserves, non-distributed net profit after tax and accumulated other comprehensive income and minority interests after application of transitional provisions concerning prudential filters.

The main prudential filters applying to the group are:

- Exclusion of fair value reserves related to gains and losses on cash flow hedges;
- Exclusion of gains and losses recognized by the institution from valuing liabilities at fair value that are due to changes in the institution's credit standing;
- Exclusion of minority interests – subject to a phase-in;
- Deduction of deferred tax assets dependent on future profits;
- Intangible assets and consolidated goodwill;
- prudential valuation adjustments (PVA). Total assets & liabilities valued at fair value represent less than €15 billion, RCI applies the simplified method to calculate this additional adjustment to own equity;
- irrevocable payment commitments and certificates of association pledged to Single Resolution Funds and Deposit Guarantee and Resolution Funds.

Shareholdings of more than 10% in financial sector entities and deferred tax assets dependent on future profits linked to temporary differences are lower, after application of the threshold, than the twofold common deductible of 17.5% and are therefore weighted by 250% in assets.

No phase-in is applied in 2019. In 2018, IDAs depending on future profits linked to deferrable deficits existing at end December 2013 were deducted from regulatory capital at 80%.

RCI Banque's CET1 core capital represents 86.2% of total prudential capital at end December 2019 against 99.9% at end 2018, due to €850M subordinate T2 issuance.

Category 1 capital increased by €412M compared to 31 December 2018 to €5,332M, RCI Banque having included the result for 2019 net of interim dividends that RCI Banque paid to its shareholder.

ADDITIONAL TIER 1 CAPITAL ("AT1")

This comprises capital instruments, which are free of any repayment incentive or obligation (in particular jumps on yield), as described in Articles 51 and 52 of the CRR.

The RCI Banque group holds no such instruments.

COMMON EQUITY TIER 2 ("CET 2")

This includes subordinated debt instruments with a minimum term of 5 years without advance repayment during these first 5 yea rs, as described in Articles 62 and 63 of the CRR.

These instruments are written down during the five-year period preceding their term.

The RCI Banque group classified €7 million of Diac equity securities in this category at the end of December 2019 as well as the subordinated bond issued in November 2019 for €850M. In line with the public guidance on the revision of the classification of equity instruments as additional Tier 1 and Tier 2 instruments, published in June 2016, RCI Banque informed its Joint Supervisory Team (JST) that the Bank issued a new T2 instrument pursuant to Article 63 of CRR.

IIII-6 Main characteristics of equity instruments

Features	Relevant information
Issuer	DIAC S.A.
Unique identifier	FR0000047821
Governing law(s) of the instrument	French
Eligible at solo/(sub-)consolidated or combined	Eligible at consolidated level (RCI Banque)
Instrument type	T2
Amount recognized in regulatory capital	7 M€
Nominal amount of instrument	1000 FRF or 152.45€
Accounting classification	Subordinated debt
Original date of issuance	1/04/85
Perpetual or dated	Perpetual
Issuer call subject to prior supervisory approval	None
Fixed or floating dividend/coupon	Floating coupon
Coupon rate and any related index	Based on the net result, with a minimum of the TAM (floored at 6.5%) and 130% of the TAM
Existence of step up or other incentive to redeem	No step up or incentive to redeem
Convertible or non-convertible	non-convertible
Write-down features	None
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated bonds with no enhancement clause. Participating loan stocks are junior to senior debt of the issuer. In the event of company liquidation, notes shall be repaid after the payment of all other liabilities.

Features	Relevant information
Issuer	RCI Banque S.A.
Unique identifier	FR0013459765
Governing law(s) of the instrument	French
Eligible at solo/(sub-)consolidated or combined	Eligible at consolidated level (RCI Banque)
Instrument type	T2
Amount recognized in regulatory capital	850 M€
Nominal amount of instrument	100 000 €
Accounting classification	Subordinated debt
Original date of issuance	November 18, 2019
Perpetual or dated	February 18, 2030
Issuer call option	Call option at February 18, 2025
Fixed or floating dividend/coupon	Fixed coupon
Coupon rate and any related index	2.625%
Existence of step up or other incentive to redeem	If the call option is not exercised, the coupon rate is adjusted to a 5-Year Mid-Swap Rate of + 2.85%
Convertible or non-convertible	non-convertible
Write-down features	None
Position in subordination hierarchy in liquidation (specify instrument type immediately senior to instrument)	Subordinated bonds with no enhancement clause. Subordinated bonds are junior to senior debt of the issuer. In the event of company liquidation, notes shall be repaid after the payment of all other liabilities.

By the same token, the negative difference between the balance of provisions and expected losses is deducted from equity, within the framework of the advanced approach to credit risk. When expected losses are lower than value adjustments and collective impairments, the balance is added to additional equity up to 0.6% of the weighted risks of exposures treated by the “internal rating” method.

No amount was added to Tier 2 equity at the end of December 2019.

No transitional filter is applied to Tier 2 equity for the RCI group.

IIII-7 FP1 - Breakdown of regulatory capital by category

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Common Equity Tier 1 capital: instruments and reserves			
Capital instruments and the related share premium accounts	814	26 (1), 27, 28, 29, EBA list 26 (3)	
of which: Ordinary shares	*100*	*EBA list 26 (3)*	
of which: Instrument type 2	*714*	*EBA list 26 (3)*	
of which: Instrument type 3		*EBA list 26 (3)*	
Retained earnings	2 357	26 (1) (c)	
Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)	2 026	26 (1)	
Funds for general banking risk		26 (1) (f)	
Amount of qualifying items referred to in Article 484 (3) and the related share premium accounts subject to phase out from CET1		486 (2)	
Public sector capital injections grandfathered until 1 January 2018		483 (2)	
Minority Interests (amount allowed in consolidated CET1)		84, 479, 480	
Independently reviewed interim profits net of any fore- seeable charge or dividend	453	26 (2)	
Common Equity Tier 1 (CET1) capital before regulatory adjustments	**5 650**		

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Common Equity Tier 1 capital : instruments and reserves			
Additional value adjustments (-)	-51	34, 105	
Intangible assets (net of related tax liability) (-)	-89	36 (1) (b), 37, 472 (4)	
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (-)	-121	36 (1) (c), 38, 472 (5)	
Fair value reserves related to gains or losses on cash flow hedges	20	33 (a)	
Negative amounts resulting from the calculation of expected loss amounts	-84	36 (1) (d), 40, 159, 472 (6)	
Any increase in equity that results from securitised assets (-)		32 (1)	
Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	7	33 (b)	
Defined-benefit pension fund assets (-)		36 (1) (e), 41, 472 (7)	
Direct and indirect holdings by an institution of own CET1 instruments (-)		36 (1) (f), 42, 472 (8)	
Holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of		36 (1) (g), 44, 472 (9)	
Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a investment in those entities (< 10% threshold		36(1)(h),43,45, 46,49(2)(3),79, 472(10)	
Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a investment in those entities (<10% threshold and		36-1,43,45,47,48-1,49,79,470,47	
Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative		*36 (1) (k)*	
of which: qualifying holdings outside the financial sector (-)		*36 (1) (k) (i), 89 to 91*	
of which: securitisation positions (-)		*36 (1) (k) (ii)243 (1) (b)244 (1) (b) 258*	
of which: free deliveries (-)		*36 (1) (k) (iii), 379 (3)*	
Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in 38 (3) are met) (-)		36 (1) (c), 38, 48 (1)(a), 470, 472 (5)	
Amount exceeding the 15% threshold (-)		48 (1)	
of which: direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those		*36 (1) (i), 48 (1) (b),470, 472 (11)*	
Empty Set in the EU			
of which: deferred tax assets arising from temporary differences		*36 (1) (c), 38, 48 (1)(a), 470, 472 (5)*	
Losses for the current financial year (-)		36 (1) (a), 472 (3)	
Foreseeable tax charges relating to CET1 items (-)		36 (1) (l)	
Regulatory adjustments applied to Common Equity Tier 1 in respect of amounts subject to pre-CRR treatment			
Regulatory adjustments relating to unrealised gains and losses pursuant to Articles 467 and 468			
of which: filter for unrealised loss		*467*	
of which: filter for unrealised gain		*468*	
Amount to be deducted from or added to Common Equity Tier 1 capital with regard to additional filters and deductions required pre CRR		481	
Qualifying AT1 deductions that exceed the AT1 capital of the institution (-)		36 (1) (j)	
Total regulatory adjustments to Common equity Tier 1 (CET1)	**-318**		
Common Equity Tier 1 (CET1) capital	**5 332**		

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Additional Tier 1 (AT1) capital: instruments			
Capital instruments and the related share premium accounts		51, 52	
of which: classified as equity under applicable accounting standards			
of which: classified as liabilities under applicable accounting standards			
Amount of qualifying items referred to in Article 484 (4) and the related share premium accounts subject to phase out from AT1		486 (3)	
Public sector capital injections grandfathered until 1 January 2018		483 (3)	
Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		85, 86, 480	
of which: instruments issued by subsidiaries subject to phase out		*486 (3)*	
Additional Tier 1 (AT1) capital before regulatory adjustments			
Additional Tier 1 (AT1) capital: regulatory adjustments			
Direct and indirect holdings by an institution of own ATI Instruments (-)		52 (1) (b), 56 (a), 57, 475 (2)	
Holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of		56 (b), 58, 475 (3)	
Direct and indirect holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (< 10% threshold and net of		56 (c), 59, 60, 79, 475 (4)	
Direct and indirect holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (< 10% threshold		56 (d), 59, 60, 79, 475 (4)	
Regulatory adjustments applied to additional tier 1 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU)			
Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of		472, 472 (3) (a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)	
of which: Own capital instruments			
of which: non-significant investments in the capital of other financial sector entities			
of which: significant investments in the capital of other financial sector entities			
Residual amounts deducted from Additional Tier 1 capital with regard to deduction from Tier 2 capital during the transitional period pursuant to article 475 of Regulation (EU) No		477, 477 (3), 477 (4) (a)	
of which: Own capital instruments			
of which: non-significant investments in the capital of other financial sector entities			
of which: significant investments in the capital of other financial sector entities			
Amount to be deducted from or added to Additional Tier 1 capital with regard to additional filters and deductions required pre- CRR		467, 468, 481	
Qualifying T2 deductions that exceed the T2 capital of the institution (-)		56 (e)	
Total regulatory adjustments to Additional Tier 1 (AT1) capital			
Additional Tier 1 (AT1) capital			
Tier 1 capital (T1 = CET1 + AT1)	**5 332**		

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Tier 2 (T2) capital: instruments and provisions			
Capital instruments and the related share premium accounts	857	62, 63	
Amount of qualifying items referred to in Article 484 (5) and the related share premium accounts subject to phase out from T2		486 (4)	
Public sector capital injections grandfathered until 1 January 2018		483 (4)	
Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held		87, 88, 480	
of which: instruments issued by subsidiaries subject to phase out		*486 (4)*	
Credit risk adjustments		62 (c) et (d)	
Tier 2 (T2) capital before regulatory adjustments	**857**		

Tier 2 (T2) capital: regulatory adjustments			
Direct and indirect holdings by an institution of own T2 instruments and subordinated bans (-)		63 (b) (i), 66 (a), 67, 477 (2)	
Holdings of the T2 instruments and subordinated bans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the		66 (b), 68, 477 (3)	
Direct and indirect holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-) *of which new holdings not subject to transitional arrangements* *of which holdings existing before 1 January 2013 and subject to transitional arrangements*		66 (c), 69, 70, 79, 477 (4)	
Direct and indirect holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net		66 (d), 69, 79, 477 (4)	
Regulatory adjustments applied to tier 2 in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/2013 (i.e. CRR residual amounts)			
Residual amounts deducted from Tier 2 capital with regard to deduction from Common Equity Tier 1 capital during the transitional period pursuant to article 472 of Regulation (EU) *of which: Own capital instruments* *of which: non-significant investments in the capital of other financial sector entities* *of which: significant investments in the capital of other financial sector entities*		472, 472 (3) (a), 472 (4), 472 (6), 472 (8) (a), 472 (9), 472 (10) (a), 472 (11) (a)	
Residual amounts deducted from Tier 2 capital with regard to deduction from Additional Tier 1 capital during the transitional period pursuant to article 475 of Regulation (EU) No 575/2013 *of which: Own capital instruments* *of which: non-significant investments in the capital of other financial sector entities* *of which: significant investments in the capital of other financial sector entities*		475, 475 (2) (a), 475 (3), 475 (4) (a)	
Amount to be deducted from or added to Tier 2 capital with regard to additional filters and deductions required pre CRR		467, 468, 481	
Total regulatory adjustments to Tier 2 (T2) capital			
Tier 2 (T2) capital	**857**		

Total capital (TC = T1 + T2)	**6 189**		

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Risk weighted assets in respect of amounts subject to pre-CRR treatment and transitional treatments subject to phase out as prescribed in Regulation (EU) No 575/ 2013(i.e. CRR residual amounts)			
of which: Adjustment of the 15 % threshold, part of the significant investments of the CET1, items not deducted from CET1 (Regulation (EU) No 575/2013 residual amounts)		*472,472(5),472(8)(b),472(10)(b),472(11)(b)*	
of which: Adjustment of the 15 % threshold, deferred tax assets part, items not deducted from CET1 (Regulation (EU) No 575/2013 residual amounts)			
of which: items not deducted from AT1 items (Regulation (EU) No 575/2013 residual amounts)		*475,475(2)(b),475(2)(c),475(4)(b)*	
Items not deducted from T2 items (Regulation (EU) No 575/2013 residual amounts)		*477,477(2)(b),477(2)(c),477(4)(b)*	
Total risk weighted assets	**34 915**		
Capital ratios and buffers			
Common Equity Tier 1 (as a percentage of risk exposure amount)	15.27%	92 (2) (a), 465	
Tier 1 (as a percentage of risk exposure amount)	15.27%	92 (2) (b), 465	
Total capital (as a percentage of risk exposure amount)	17.73%	92 (2) (c)	
Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or 0-SII buffer), expressed as a percentage of risk exposure amount)	2.71%	CRD 128, 129, 130	
of which: capital conservation buffer requirement	*2.50%*		
of which: countercyclical buffer requirement	*0.21%*		
of which: systemic risk buffer requirement			
of which: Global Systemically Important Institution (G-511) or Other Systemically Important Institution (0-SII) buffer		*CRD 131*	
Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	10.77%	CRD 128	
[non relevant in EU regulation]			
[non relevant in EU regulation]			
[non relevant in EU regulation]			
Capital ratios and buffers			
Direct and indirect holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (< 10% threshold and net of eligible short positions)		36-1,45,46,472-10,56,59,60,475-4,66,69,70,477-4	
Direct and indirect holdings by the institution of the CET 1 instruments of financial sector entities where the institution has a significant investment in those entities (< 10% threshold and net of eligible short positions)		36 (1) (i), 45, 48, 470, 472 (11)	
Empty Set in the EU			
Deferred tax assets arising from temporary differences (amount below 10% threshold, net of related tax liability where the conditions in Article 38 (3) are met)		36 (1) (c), 38, 48, 470, 472 (5)	
Applicable caps on the inclusion of provisions in Tier 2			
Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)		62	
Cap on inclusion of credit risk adjustments in T2 under standardised approach	176	62	
Credit risk adjustments included in T2 in respect of exposures subject to internai ratings-based approach (prior to the application of the cap)		62	
Cap for inclusion of credit risk adjustments in T2 under internai ratings-based approach	101	62	

In millions of euros	Amount at disclosure date	Regulation (EU) no 575/2013 reference	Amounts subject to pre-regulation or prescribed residual amount of regulation (EU) no 575/2013
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2013 and 1 Jan 2022)			
Current cap on CET1 instruments subject to phase out arrangements		484 (3), 486 (2) et (5)	
Amount excluded from CET1 due to cap (excess over cap atter redemptions and maturities)		484 (3), 486 (2) et (5)	
Current cap on AT1 instruments subject to phase out arrangements		484 (4), 486 (3) et (5)	
Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		484 (4), 486 (3) et (5)	
Current cap on T2 instruments subject to phase out arrangements		484 (5), 486 (4) et (5)	
Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		484 (5), 486 (4) et (5)	

4 - CAPITAL REQUIREMENTS

Prudential requirements are determined in accordance with transitional texts and arrangements applying from 1st January 2014 to credit institutions and investment firms, as published in the Official Journal of the European Union on 26 June 2013: Regulation (EU) 575/2013 and Directive 2013/36/EU, transposed by Order 2014-158 of 20 February 2014. This upward trend in capital requirements primarily reflects the overall increase in activity of the RCI Banque group.

RCI Banque does not own any non-consolidated financial institution with an actual amount of capital less than its capital requirement.

IIII-8 OV1- Overview of RWA

In Millions of euros	**RWA**		**Min. capital requirements**
	12/2019	**09/2019**	**12/2019**
Credit risk (excluding CCR)	29 858	30 995	2 389
Of which the standardised approach	*13 034*	*14 772*	*1 043*
Of which the foundation IRB (FIRB) approach	*189*	*122*	*15*
Of which the advanced IRB (AIRB) approach	*16 635*	*16 101*	*1 331*
Of which equity IRB under the simple RWA or the IMA			
Counterparty Credit Risk	261	369	21
Of which mark to market			
Of which original exposure			
Of which the standardised approach	*103*	*93*	*8*
Of which internal model method (IMM)			
Of which REA for contributions to the default fund of a CCP			
Of which Credit Valuation Adjustment	*158*	*276*	*13*
Settlement risk			
Securitisation exposures in the banking book (after the cap)			
Of which IRB approach			
Of which IRB supervisory formula approach (SFA)			
Of which internal assessment approach (IAA)			
Of which standardised approach			
Market risk			
Of which the standardised approach			
Of which IMA			
Large exposures			
Operational risk	3 854	3 502	308
Of which basic indicator approach			
Of which standardised approach	*3 854*	*3 502*	*308*
Of which advanced measurement approach			
Amounts below the thresholds for deduction (subject to 250% RW)	942	877	75
Floor adjustment			
Total	**34 915**	**35 743**	**2 793**

5 - MANAGEMENT OF INTERNAL CAPITAL

The internal capital requirement results from an assessment of the capital needed to deal with all RCI Banque's risks (Pillar I + Pillar II).

It equals the floor value of capital that the group's management considers necessary to tackle its risk profile and strategy.

Capital is managed by the "Accounting and Performance Control" and "Finance and Treasury" Divisions with the endorsement of the Chief Risk Officer and Chief Executive Officer under the control of RCI Banque's Board of Directors.

The RCI Banque group's capital management policy aims to optimize the use of own funds to maximize short and long- term yield for the shareholder, while maintaining a Core Tier one ratio that is consistent with the target rating needed to optimize refinancing.

The RCI group accordingly determines its internal solvency target in accordance with its goals and in compliance with regulatory thresholds.

For that purpose, the group implements an Internal Capital Adequacy Assessment Process (ICAAP) that enables it to meet the following two main aims:

- Periodically assess, and preserve in the medium term, adequate capital requirements to cover all types of risks incurred by the RCI Banque group, both under normal "centered" and stressed conditions. The said conditions are simulated using stress scenarios at least once a year.
- Constantly ensure that the RCI group has market access by enabling it in all stress situations to maintain its rating, solvency ratios and other indicators analyzed by the market, in direct comparison with the competition.

As such, and in accordance with regulatory texts, the ICAAP adopts a multidimensional approach that more particularly takes into account the following general principles:

- **Alignment with the group's risk profile and strategy**: the ICAAP is incorporated into the group's key processes: definition of economic models, the budgetary and forecasting process, the risk identification process, the risk appetite framework, the ILAAP (Internal Liquidity Adequacy Assessment Process) and the recovery plan.
- **Proportional approach based on a periodic review** of its risk appetite, its profile and its level of capital geared to its economic model, size and complexity.
- **Planning and setting risk limits**: RCI forecasts its own funds requirements based on the forecasting process fixed by the ICAAP and sets limits enabling it to remain consistent with the risk appetite approved by RCI Banque's Board of Directors.
- **Monitoring, control and supervision**: RCI regularly monitors the Risk Appetite Framework and the ICAAP indicators and thresholds at all levels of the company to ensure it complies with the set thresholds.

6 - LEVERAGE RATIO

The Basel III/CRD IV regulations introduce the leverage ratio, the main aim of which is to serve as an additional measure to capital requirement based on weighted risks in order to avoid excessive development of exposures in relation to own funds.

Article 429 of the capital requirements regulation (CRR) specifies the methods for calculating the leverage ratio; it has been modified and replaced with delegated regulation (EU) 62/2015 of 10 October 2014, published in the OJEU on 18 January 2015. The leverage ratio shall be calculated as the ratio of the institution's Tier 1 capital to that of institution's total exposure, which includes balance sheet assets and off-balance sheet assets measured using a prudential approach.

Since 1st January 2015, disclosure of the leverage ratio has been mandatory (Article 521-2a of the CRR) at least once a year (CRR a.433), together with the financial statements (BCBS270 Article 45).

The implementation of a 3% minimum regulatory requirement for the leverage ratio was endorsed with the adoption of the banking package (CRR2 / CRD V).

The RCI Banque group's leverage ratio, estimated according to CRR/CRD IV rules and factoring in the delegated regulation of October 2014, was 8.90% at 31 December 2019.

IIII-9 LRSum - Summary reconciliation of accounting assets and leverage ratio exposures

In millions of euros

Total assets as per published financial statements	**58 080**
Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-221
Adjustments for derivative financial instruments	189
Adjustment for off-balance sheet items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2 239
Other adjustments	-372
Leverage ratio total exposure measure	**59 915**

RCI has no unrecognized fiduciary assets, in accordance with Article 429.11 of the CRR.

IIII-10 LRCom - Leverage ratio

In millions of euros

On-balance sheet exposures	
On-balance sheet items (excluding derivatives, SFTs and fiduciary assets, but including collateral)	57,579
Asset amounts deducted in determining Tier 1 capital	-268
Total on-balance sheet exposures (excluding derivatives, SFTs and fiduciary assets)	**57,311**
Derivative exposures	
Replacement cost associated with all derivatives transactions (net of eligible cash variation margin)	366
Total derivatives exposures	**366**
Other off-balance sheet exposures	
Off-balance sheet exposures at gross notional amount	2,769
Adjustments for conversion to credit equivalent amounts	-530
Total other off-balance sheet exposures	**2,239**
Capital and total exposure mesure	
Tier 1 capital	5,332
Leverage ratio total exposure measure	59,915
Leverage ratio	**8.90%**

Choice on transitional arrangements for the definition of the capital measure : Transitionary definition

IIII-11 LRSpl - Breakdown of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

In millions of euros

Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures)	**57 579**
Trading book exposures	
Banking book exposures, of which:	57 579
Exposures treated as sovereigns	*3 195*
Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	*39*
Institutions	*1 514*
Retail exposures	*33 062*
Corporate	*17 517*
Exposures in default	*229*
Other exposures (eg equity, securitisations, and other non-credit obligation assets)	*2 023*

IIII-12 LRQua - Statement of qualitative elements

Descriptions of the procedures used to manage the excessive leverage risk	RCI Banque monitors its leverage ratio on a monthly basis and keeps the Executive Committee informed thereof. The ratio is also stated in the balanced scorecard of risks provided quarterly to the Board of Directors' Risks Committee. An internal limit has been set and a warning system has been put in place.
Description of factors having an impact on the leverage ratio during the period to which the leverage ratio disclosed by the institution refers	RCI Banque disclosed a Basel III leverage ratio of 8.90% at the end of December 2019 against 8.89% at the end of December 2018. The ratio remains stable due to the proportional growth of risk exposure amount and Tier 1 capital.

7 - MANAGEMENT OF THE LEVERAGE RATIO

Management of the leverage ratio consists both in calibrating "Tier 1" capital (the numerator of the ratio) and adjusting the group's leveraged exposure (denominator of the ratio) to meet the target ratio the group has set for itself, higher than the minimum of 3% recommended by the Basel Committee.

Monthly monitoring of the leverage ratio ensures that it is in line with the set target.

IV - CREDIT RISK

1 - EXPOSURE TO THE CREDIT RISK

The Exposure at Default (EAD) includes both balance sheet and off-balance sheet credit exposures. Moreover, the prudential scope is different from the accounting scope of consolidation. The credit exposure values in the above table are thus different from those in Note 17 to the consolidated financial statements concerning financial assets by remainder of the term.
RCI Banque uses three risk-classification levels for receivables and writes them down on an individual or collective basis. The valuation presentation and principles are described in part A of the notes to the consolidated financial statements.

These classification levels are:

- Bucket 1: no deterioration or insignificant deterioration in credit risk from origination;
- Bucket 2: significant deterioration of credit risk from origination or non investment grade financial counterparty;
- Bucket 3: deterioration such as ascertained loss (category of default).

IV-1 CR3 - Credit risk mitigation techniques – overview

In millions of euros	**Exposures unsecured**	**Exposures to be secured**	**Exposures secured by collateral**	**Exposures secured by financial guarantees**	**Exposures secured by credit derivatives**
Loans	53 495		889		
Debt securities	1 259				
Total	**54 754**		**889**		
Of which defaulted	*676*				

IVV-2 CRB-B - Total and average net amount of exposures

In Millions of euros	Net value of exposures at the end of the period	Average net exposures over the period
Central governments or central banks		
Institutions		
Corporates	12 449	10 940
Of which: Specialised lending		
Of which: SMEs	*2 930*	*2 549*
Retail	27 551	26 862
Secured by real estate property		
SMEs		
Non-SMEs		
Qualifying revolving		
Other retail	*27 551*	*26 862*
SMEs	*2 871*	*2 815*
Non-SMEs	*24 680*	*24 047*
Equity		
Total IRB approach	**40 000**	**37 803**
Central governments or central banks	3 198	3 048
Regional governments or local authorities	171	58
Public sector entities	0	9
Multilateral development banks		
International organisations	15	15
Institutions	1 584	1 458
Corporates	6 248	6 084
Of which: SMEs	*3 450*	*3 081*
Retail	7 115	6 698
Of which: SMEs	*1 227*	*1 230*
Secured by mortgages on immovable property		
Of which: SMEs		
Exposures in default	88	82
Items associated with particularly high risk		
Covered bonds		
Claims on institutions and corporates with a short-term credit assessment	147	107
Collective investments undertakings	80	1 758
Equity exposures	221	236
Other exposures	1 760	939
Total standardised approach	**20 626**	**20 492**
Total	**60 626**	**58 295**

IVV-3 CRB-C - Geographical breakdown of exposures

In Millions of euros	France	Germany	Great-Britain	Italy	Spain	Brazil	South Korea	Swiss	Portugal	Poland	Netherland	Other countries	Total
Central governments or central banks													
Institutions													
Corporates	7 173	1 736	981	1 427	1 132								12 449
Retail	8 241	6 673	3 302	4 458	3 304		1 574						27 551
Equity													
Total IRB approach	**15 414**	**8 409**	**4 283**	**5 886**	**4 435**		**1 574**						**40 000**
Central governments or central banks	1 048	783	658	153	10	230	100	3	41	50	2	119	3 198
Regional or local authorities	45			125									171
Public sector entities						0							0
Multilateral development banks													
International organisations												15	15
Institutions	749	191	160	154	12	2	33	1	2	11	34	236	1 584
Corporates	653	234	26	298	289	597	21	475	644	419	379	2 213	6 248
Retail	522	27	385	339	182	1 925	9	432	256	523	410	2 105	7 115
Secured by mortgages on immovable property													
Exposures in default	4	0	4	17	0	25	4	4	1	1	2	25	88
Items associated with particularly high risk													
Covered bonds													
Claims on institutions and corporates with a short-term credit	27	14				88						17	147
Collective investments undertakings						6						74	80
Equity exposures	3										84	133	221
Other exposures	829	240	264	81	34	7	12	42	51	32	15	154	1 760
Total standardised approach	**3 881**	**1 489**	**1 496**	**1 168**	**526**	**2 880**	**180**	**958**	**996**	**1 036**	**926**	**5 091**	**20 626**
Total	**19 295**	**9 898**	**5 779**	**7 053**	**4 962**	**2 880**	**1 754**	**958**	**996**	**1 036**	**926**	**5 091**	**60 626**

IV-4 CRB-D - Concentration of exposures by industry or counterparty types

In Millions of euros	Central governments or central banks	Institutions	Other financial corporations	Households	Non-financial corporations	Of which								Other exposures	Total
						Manufacturing	*Construction*	*Wholesale and retail trade*	*Transport ans storage*	*Professional, scientific and technical activities*	*Administrative and support service activities*	*Human health services and social work activities*	*Other sectors*		
Central governments or central banks															
Institutions															
Non-financial corporations					15 320	594	935	10 641	387	330	1 111	288	1 035		15 320
Households				24 680											24 680
Equity															
Total IRB approach				**24 680**	**15 320**	**594**	**935**	**10 641**	**387**	**330**	**1 111**	**288**	**1 035**		**40 000**
Central governments or central banks	3 198														3 198
Regional or local authorities			171												171
Public sector entities			0												0
Multilateral development banks															
International organisations			15												15
Institutions		1 584													1 584
Non-financial corporations					7 638	397	271	5 182	236	180	376	57	939		7 638
Households				5 725											5 725
Secured by mortgages on immovable property															
Exposures in default	0		0	30	57	3	4	33	2	4	2	1	8	0	88
Items associated with particularly high risk															
Covered bonds															
Claims on inst. and corporates with a ST credit assessment		147													147
Collective investments undertakings														80	80
Equity exposures														221	221
Other exposures														1 760	1 760
Total standardised approach	**3 198**	**1 731**	**186**	**5 756**	**7 694**	**400**	**275**	**5 214**	**238**	**185**	**377**	**58**	**947**	**2 060**	**20 626**
Total	**3 198**	**1 731**	**186**	**30 436**	**23 015**	**994**	**1 210**	**15 855**	**625**	**515**	**1 488**	**346**	**1 982**	**2 060**	**60 626**

IV-5 CRB-E - Maturity of exposures

In Millions of euros	On Demand	≤ 1 year	> 1 year and ≤ 5 years	> 5 years	No stated maturity	Total
Central governments or central banks						
Institutions and other financial corporations						
Non-financial corporations	364	11 936	2 993	28		15 320
Households	271	8 630	15 457	322		24 680
Other exposures						
Total IRB approach	**635**	**20 566**	**18 450**	**350**		**40 000**
Central governments or central banks	1 788	915	468	27		3 198
Institutions and other financial corporations	1 272	114	188	229	114	1 917
Non-financial corporations	1 254	5 210	1 129	100	1	7 694
Households	62	2 155	3 363	175		5 756
Other exposures					2 060	2 060
Total standardised approach	**4 377**	**8 395**	**5 148**	**531**	**2 175**	**20 626**
Total	**5 012**	**28 961**	**23 598**	**881**	**2 175**	**60 626**

IV-6 CR1-A - Credit quality of exposures by exposure class and instrument

In Millions of euros	Gross values of defaulted exposures	Gross values of non-defaulted exposures	Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Net value	Credit risk adjustment charges of the period
Central governments or central banks							
Institutions							
Corporates	61	12 463	-32	-44		12 449	-4
Of which: Specialised lending							
Of which: SMEs	*41*	*2 923*	*-19*	*-14*		*2 930*	*-6*
Retail	412	27 684	-299	-246		27 551	-32
Secured by real estate property							
SMEs							
Non-SMEs							
Qualifying revolving							
Other retail	*412*	*27 684*	*-299*	*-246*		*27 551*	*-32*
SMEs	*75*	*2 876*	*-51*	*-28*		*2 871*	*-12*
Non-SMEs	*336*	*24 808*	*-247*	*-217*		*24 680*	*-20*
Equity							
Total IRB approach	**473**	**40 147**	**-330**	**-290**		**40 000**	**-36**
Central governments or central banks	0	3 199		-1		3 198	-1
Regional governments or local authorities	0	171				171	0
Public sector entities		0				0	
Multilateral development banks							
International organisations		15				15	
Institutions		1 584		0		1 584	0
Corporates	76	6 296	-34	-48		6 290	-6
Of which: SMEs	*64*	*3 483*	*-32*	*-33*		*3 483*	*-5*
Retail	124	7 190	-79	-74		7 160	-32
Of which: SMEs	*28*	*1 237*	*-14*	*-10*		*1 241*	*-4*
Secured by mortgages on immovable property							
Of which: SMEs							
Exposures in default							
Items associated with particularly high risk							
Covered bonds							
Claims on inst. and corporates with a ST credit assessment		147				147	
Collective investments undertakings		80				80	
Equity exposures		221				221	
Other exposures		1 760				1 760	
Total standardised approach	**201**	**20 662**	**-113**	**-124**		**20 626**	**-39**
Total	**673**	**60 809**	**-443**	**-414**		**60 626**	**-75**
Of which: Loans	*676*	*53 708*	*-443*	*-407*		*53 534*	*-75*
Of which: Debt securities		*1 179*		*-1*		*1 178*	*1*
Of which: Off-balance-sheet exposures	*1*	*2 797*	*0*	*-5*		*2 792*	*-1*

IV-7 CR1-B - Credit quality of exposures by industry or counterparty types

In Millions of euros	Gross values of defaulted exposures	Gross values of non-defaulted exposures	Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Net value	Credit risk adjustment charges of the period
Central governments or central banks	0	3 199		-1		3 198	-1
Institutions		1 731		0		1 731	0
Other financial corporations	0	186				186	0
Households	436	30 588	-312	-275		30 436	-58
Non-financial corporations	237	23 045	-131	-137		23 015	-15
Of which: Manufacturing	*22*	*988*	*-10*	*-6*		*994*	*-6*
Of which: Construction	*26*	*1 203*	*-11*	*-7*		*1 210*	*-6*
Of which: Wholesale and retail trade	*116*	*15 909*	*-75*	*-95*		*15 855*	*18*
Of which: Transport ans storage	*16*	*616*	*-5*	*-4*		*625*	*-3*
Of which: Professional, scientific and technical activities	*10*	*513*	*-6*	*-3*		*515*	*-6*
Of which: Administrative and support service activities	*13*	*1 491*	*-7*	*-9*		*1 488*	*0*
Of which: Human health services and social work activities	*3*	*348*	*-3*	*-2*		*346*	*-1*
Of which: Other sectors	*29*	*1 977*	*-14*	*-11*		*1 982*	*-12*
Other exposures	0	2 060				2 060	
Total	**673**	**60 809**	**-443**	**-414**		**60 626**	**-75**

IVIV-8 CR1-C - Credit quality of exposures by geographical area

In Millions of euros	Gross values of defaulted exposures	Gross values of non-defaulted exposures	Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Net value	Credit risk adjustment charges of the period
France	244	19 306	-157	-97		19 295	-5
Germany	39	9 906	-23	-25		9 898	-1
Great-Britain	29	5 871	-22	-99		5 779	4
Italy	115	7 039	-67	-33		7 053	-21
Spain	58	4 979	-48	-27		4 962	-17
Brazil	50	2 901	-24	-47		2 880	-23
South Korea	38	1 762	-33	-14		1 754	4
Swiss	6	957	-2	-4		958	0
Portugal	6	1 004	-5	-9		996	-1
Poland	11	1 043	-10	-9		1 036	-3
Netherland	3	926	-1	-2		926	1
Other countries	76	5 115	-51	-49		5 091	-13
Total	**673**	**60 809**	**-443**	**-414**		**60 626**	**-75**

IV-9 CRD1-D Ageing of past due exposure

In millions of euros	Gross carrying values					
	≤ 30 days	> 30 days and ≤ 60 days	> 60 days and ≤ 90 days	> 90 days and ≤ 180 days	> 180 days and ≤ 1 year	> 1 year
Loans	427	238	49	69	44	54
Debt securities						
Total exposures	**427**	**238**	**49**	**69**	**44**	**54**

IV-10 CR1-E Non performing and forborne exposure

In millions of euros	Gross carrying amount of performing and non-performing exposures						
		Of which performing but past due > 30 to 90 d	Of which performing forborne	Of which non-performing	Of which defaulted	Of which impaired	Of which forborne
Loans	54 384	41	39	676	676	676	88
Debt securities	1 259						
Off-balance-sheet exposures	2 798			1	1		

	Accumulated impairment and provisions and negative fair-value adjustments due to credit risks				Collaterals and financial guarantees received	
	On performing exposures	Of which forborne	On non-performing exposures	Of which forborne	On non-performing exposures	Of which forborne exposures
Loans	-408	0	-441	-47	102	2
Debt securities	-1					
Off-balance-sheet exposures	-5		0			

IV-11 - Credit quality of forborne exposures

In millions of euros	Gross carrying amount of exposures with forbearance measures				Accumulated impairment and change in FV		Collateral and financial guarantees received	
	Performing forborne	Non-performing forborne	Of which defaulted	Of which impaired	Performing forborne	Non-performing forborne	on forborne exposure	ow on NPE with forbearance measures
Loans and advances	**39**	**88**	**88**	**88**	**0**	**-47**	**2**	
Central banks								
General governments								
Credit institutions								
Other financial corporations								
Non-financial corporations	*5*	*4*	*4*	*4*	*0*	*-4*	*0*	
Households	*35*	*83*	*83*	*83*	*0*	*-43*	*2*	
Debt securities								
Loan commitments given								
Total	**39**	**88**	**88**	**88**	**0**	**-47**	**2**	

IV-12 - Credit quality of performing and non-performing exposures per days past due

In millions of euros	Gross carrying amount and nominal amount											
	Performing exposures			Non-performing exposures								
		Not past due or past due < 30 days	Past due beetwen 30 d and 90 d		Unlikely to pay or past due < 90 days	Past due beetwen 90 and 180 days	Past due beetwen 180 and 365 days	Past due beetwen 1 and 2 years	Past due beetwen 2 and 5 years	Past due beetwen 5 and 7 years	Past due > 7 years	Of which defaulted
Loans and advances	**53 708**	**53 667**	**41**	**676**	**508**	**69**	**44**	**53**	**1**	**0**		**676**
Central banks	*1 527*	*1 527*										
General governments	*227*	*227*		*0*	*0*							*0*
Credit institutions	*1 268*	*1 268*										
Other financial corporations												
Non-financial corporations	*21 178*	*21 158*	*20*	*239*	*196*	*19*	*6*	*17*	*0*	*0*		*239*
Of which SMEs	*10 464*	*10 446*	*18*	*194*	*157*	*18*	*5*	*14*	*0*	*0*		*194*
Households	*29 509*	*29 488*	*21*	*436*	*312*	*50*	*37*	*36*	*1*	*0*		*436*
Debt securities	**1 259**	**1 259**										
Central banks	*100*	*100*										
General governments	*901*	*901*										
Credit institutions	*2*	*2*										
Other financial corporations	*133*	*133*										
Non-financial corporations	*122*	*122*										
Loan commitments given	**2 552**			**1**								**1**
Central banks												
General governments	*43*			*0*								*0*
Credit institutions	*4*											
Other financial corporations												
Non-financial corporations	*1 458*			*1*								*1*
Households	*1 048*			*0*								*0*
Total	**57 519**	**54 926**	**41**	**677**	**508**	**69**	**44**	**53**	**1**	**0**		**677**

IV-13 - Performing and non-performing exposures and related provisions

In millions of euros	Gross carrying amount and nominal amount						Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures			Non-performing exposures			Performing exposures			Non-performing exposures				Performing exposures	Non-performing exposures
		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3		Of which stage 1	Of which stage 2		Of which stage 2	Of which stage 3			
Loans and advances	**53 708**	**50 316**	**3 393**	**676**		**676**	**-408**	**-232**	**-177**	**-441**		**-441**		**16 207**	**107**
Central banks	*1 527*	*1 527*													
General governments	*227*	*181*	*45*	*0*		*0*	*-2*	*-1*	*-1*	*0*		*0*		*8*	*1*
Credit institutions	*1 268*	*1 207*	*60*				*0*	*0*	*0*					*224*	*4*
Other financial corporations															
Non-financial corporations	*21 178*	*19 951*	*1 226*	*239*		*239*	*-130*	*-89*	*-42*	*-129*		*-129*		*11 935*	*65*
Of which SMEs	*10 464*	*9 663*	*801*	*194*		*194*	*-80*	*-46*	*-34*	*-111*		*-111*		*2 189*	*54*
Households	*29 509*	*27 448*	*2 061*	*436*		*436*	*-276*	*-143*	*-134*	*-312*		*-312*		*4 040*	*36*
Debt securities	**1 259**	**1 259**					**-1**	**-1**							
Central banks	*100*	*100*					*0*	*0*							
General governments	*901*	*901*					*-1*	*-1*							
Credit institutions	*2*	*2*													
Other financial corporations	*133*	*133*					*0*	*0*							
Non-financial corporations	*122*	*122*					*0*	*0*							
Loan commitments given	**2 552**	**2 546**	**7**	**1**		**1**	**-5**	**-5**	**0**	**0**		**0**			
Central banks															
General governments	*43*	*43*	*0*	*0*		*0*	*0*	*0*		*0*		*0*			
Credit institutions	*4*	*4*					*0*	*0*							
Other financial corporations															
Non-financial corporations	*1 458*	*1 452*	*6*	*1*		*1*	*-4*	*-4*	*0*	*0*		*0*			
Households	*1 048*	*1 048*	*1*	*0*		*0*	*-1*	*-1*	*0*	*0*		*0*			
Total	**57 519**	**54 120**	**3 399**	**677**		**677**	**-415**	**-238**	**-177**	**-442**		**-442**		**16 207**	**107**

IV-14 - Collateral obtained by taking possession and execution processes

In millions of euros	Value at initial recognition	Accumulated negative changes
Property, plant and equipment (PP&E)		
Other than PP&E		
Residential immovable property		
Commercial Immovable property		
Movable property (auto, shipping, etc.)		
Equity and debt instruments		
Other		
Total		

IV-15 CR2-A - Changes in the stock of general and specific credit risk adjustments

In millions of euros	Accumulated specific credit risk adjustment	Accumulated general credit risk adjustment
Opening balance	**139**	**651**
Increases due to amounts set aside for estimated loan losses during the period	113	252
Decreases due to amounts reversed for estimated loan losses during the period	-50	-150
Decreases due to amounts taken against accumulated credit risk adjustments	-48	-49
Transfers between credit risk adjustments		
Impact of exchange rate differences	1	-1
Business combinations, including acquisitions and disposals of subsidiaries		
Other adjustments	-1	-1
Closing balance	**154**	**702**
Recoveries on credit risk adjustments recorded directly to the statement of profit or loss	15	
Specific credit risk adjustments directly recorded to the statement of profit or loss	126	

IV-16 CR2-B - Changes in the stock of defaulted and impaired loans and debt securities

In millions of euros	GV defaulted exposures
Opening balance	**622**
Loans and debt securities that have defaulted or impaired since the last reporting period	440
Returned to non-defaulted status	-260
Amounts written off	-126
Other changes	
Closing balance	**676**

Defaulting exposures and valuation adjustments on “other categories of exposures” are non-significant.

2 CREDIT RISK MANAGEMENT PROCESS

For both the Customers and the Wholesale business, the credit risk prevention policy aims to ensure that the budgeted cost of risk for each country is met, regarding the brands and the main markets.

RCI Banque uses advanced scoring systems, and external databases whenever the information is available, to assess the capacity of individual and business customers to meet their commitments. An internal rating system is also used to assess loans to dealerships. RCI Banque constantly monitors its acceptance policy to consider the economic environment conditions.

CUSTOMER RISK MANAGEMENT

The acceptance policy is adjusted and the tools (approval scores, combined with additional rules) are optimized regularly consequently. Collection of incident-flagged or defaulted receivables is also adjusted regarding the means or strategy, according to customer typology and the difficulties encountered.

Contractual termination can thus be accelerated when faced with the risk when the debt becomes irrecoverable in a very short term. At the Corporate level, the Operations and Credit Risk Management department manages the cost of risk of the subsidiaries and coordinates the action plans aimed at achieving the set targets. Granting conditions are subject to the strict Corporate rules, and the management of the financing and the recovery is very deeply monitored. The subsidiaries' performances in terms of the quality of acceptance and the collection efficiency are analyzed in monthly Risk reports and are presented to the Corporate by the subsidiaries during monthly or quarterly (depending on the significance of the country concerned and its current topics) committees.

The treatment of restructured debt is compliant with the Basel Committee guidelines and the recommendations of the European Central Bank. This treatment is laid down in a framework procedure and declined in the local management/ recovery procedures.

DEALER RISK MANAGEMENT

For the perimeter of each subsidiary, the Dealers are monitored daily by the means of short-term indicators that, combined with long-term indicators, identify in advance any deal presenting a partial or total risk of non-collection. Within the subsidiaries with internal model in place, the internal rating plays a key role in identifying deals that present a heightened risk of default.

At the Corporate level, the Wholesale Funding department puts in place the corpus of risk control procedures. Customers identified as risky are classified as "incident", “pre-alert" or "doubtful". High risk customers are reviewed within the risk committees in the subsidiaries. The members of said risk committees include the manufacturers' local managers and RCI Banque managers dealing with the network to decide on the action plans and urgent interim measures needed to manage the risk.

RETAIL CUSTOMER BUSINESS RESULTS AT THE END OF DECEMBER 2019

The accounting cost of risk, which reflects the variation in stock of provisions and bad debts write-offs, is the main measure of risk management. The IFRS9 provisioning standard has been applied since 1 January 2018 in all entities in the RCI Bank & Services Group consolidation perimeter. Two distinct methods have been employed depending on the size of the entity in question:

- a method based on using behavior and loss rate internal models (France, Germany, Spain, Italy, United Kingdom, Korea, Brazil), in which the Bucket 1/Bucket 2 exposures are staged according to the rating from behavior models, and their evolution since the origination, the staging in Bucket 3 corresponding to the default status. The discounted provision is determined in accordance with point-in-time risk parameters (especially Probabilities of Default and Loss Given Default rate calculated on recent records) specific to IFRS9 provisioning;
- for other entities using the standard method, provisions are calculated using transition matrices applied to the portfolio's aged balances. In this context, the Bucket 2 corresponds to the receivables with past due more than 30 days at the closing date, or that encountered a past due amount in the last 12 months.

The Retail Customer cost of risk at end of December 2019 closed at 0.47% of average performing assets (APA), against 0.51% at end of December 2018. 2019 was marked by an increase of the cost of risk related to defaulted outstandings, which stood at 0.44% vs. 0.35% in 2018, due to a stronger write-off policy and the default of two major fleets in Spain and Italy. As a result of the growth of our performing assets over the period, the impact of the provisioning of healthy outstandings was 0.06% in 2019. This expense was partly offset by an improvement in the quality of the healthy portfolio (risk gain of -0,03%).

The proportion of retail customer bad debts (excluding factoring) remained stable at 1.48% for a total of €585M. Including factoring, bad debts represented 1.49% of total retail customer outstandings at end-2019. The coverage rate for bad debt was 69.6% at end-2019, compared to 64.9% at end-2018.

Performing and non-performing restructured receivables amounted to €123.4M, increasing compared to end of December 2018 (€112M).

DEALER BUSINESS RESULTS AT END OF DECEMBER 2019

RCI Banque continued its policy of support for manufacturers and their distribution networks by providing suitable financing solutions. In that respect, managing inventories with the manufacturers and ensuring their appropriateness for market conditions remained a priority.

In 2019, RCI Banque stabilized its international presence and supported the development of Alliance brands and their dealer networks.

Dealer network outstandings across the entire scope of operations amounted €11.8bn at end-December 2019 compared with €11.1bn at end-December 2018.

The 2019 cost of risk is on net release at -0,09% of the average performing outstandings. The release of Forward-looking provisions, which takes into account the macro-economic environment, offset the provisions related to the increase of outstandings and the passage of certain dealers into compromised status, notably in France, Germany and Spain.

Bad debt fell by 13%, from €62M (0.56% of dealer network outstandings) at end-December 2018 to €54M (0.46% of dealer network outstandings) at end-December 2019.

In 2019, the amounts recovered on returns to better fortunes (€0.6M) exceeded that of write-offs (€0.3M), confirming the favorable trend observed in 2018.

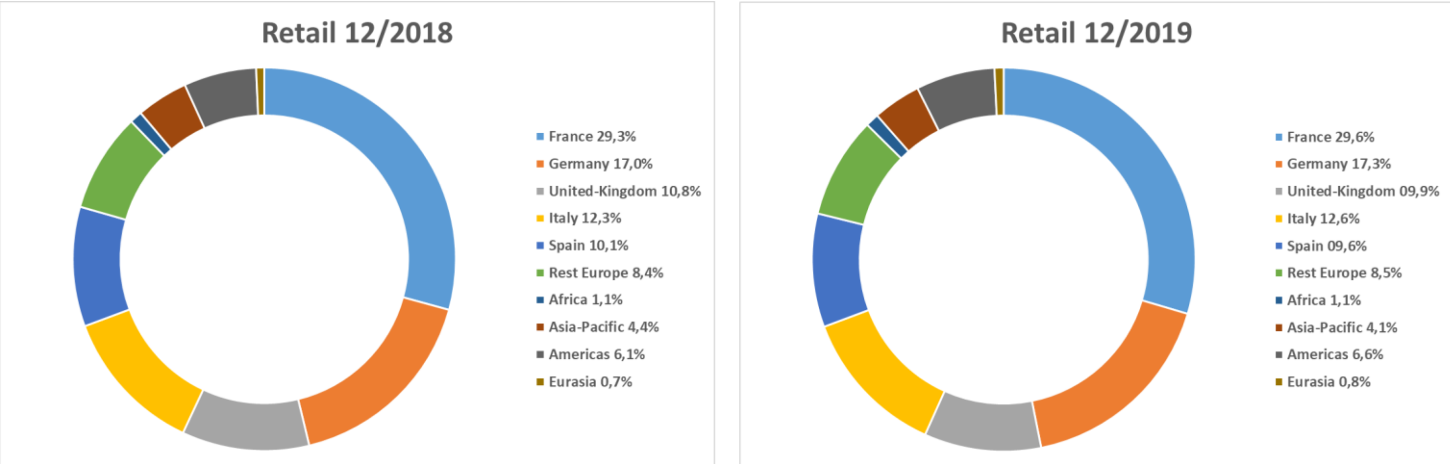
Restructured receivables outstandings were limited to €3.7M, a low level, and down on last year (€7.3M at 12/2018), which confirms the low risk on Dealer network finance.

3 - DIVERSIFICATION OF CREDIT RISK EXPOSURE

RCI customer performing assets at end December 2019 were up 9.1% at 39 billion euros. They are spread over 25 countries, with Europe well represented. Apart from the United Kingdom and Argentina, all countries are up, with more marked performance in France, Germany, Brazil and Italy which, at 2.6 billion euros, contribute to a total increase on 3.2 billion. The weight of G7 countries (IRB approved or included in the approval plan for Brazil) remains stable at 88.2% of total RCI in 2019. The increase shows the momentum of markets where RCI operates, excluding the United Kingdom which saw its share fall from 10.8% in 2018 to 9.9% in 2019.

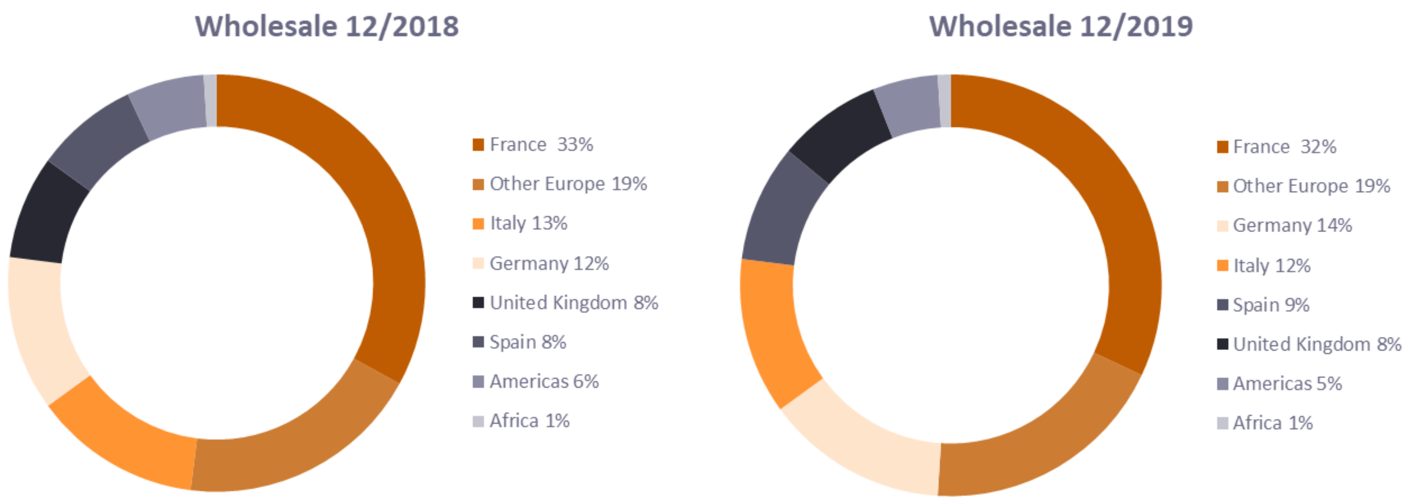
In terms of the breakdown of customer business by product, credits represented 63% of RCI outstandings, down 2 points, financial leases 34%, up 2 points, and operating leases (including battery leases) were stable at 3%.

IVIV-17 Retail credit risk exposure



Dealer Network outstandings are spread across 25 consolidated countries, predominantly in Europe. The breakdown of outstandings by country remained relatively stable. However, behind France, Germany overtook Italy to return second place due to an increase in Renault/Dacia outstandings, and the Americas saw their weight decrease slightly due to the sharp downturn in the Argentine market.

IV-18 Wholesale credit risk exposure



4 - RISK-WEIGHTED ASSETS

RCI Banque uses the advanced method to measure credit risk for customer outstandings in the following countries: France, Germany, Spain, Italy, South Korea and the United Kingdom. For all other exposures and risks, RCI Banque uses the standardized method.

5 - ADVANCED METHOD

RCI Banque has adopted the most advanced methods proposed by the reform known as Basel II/III to measure and monitor its credit risks, all parameters are therefore estimated internally. The values thus measured are applied to calculate exposure risks on the Retail , Corporate and Dealer customers. Six big countries (Germany, Spain, France, Italy, South Korea and United Kingdom[2]) are treated using the advanced approach based on internal ratings.

For all of these scopes, RCI has obtained the following authorizations:

- For France, Germany, Italy and Spain, approved in January 2008;
- For the United Kingdom, approved in January 2010;
- For Korea, approved in June 2011.

The credit risk models applied within RCI Banque are subject to on-site supervisor inspections, giving rise to obligations and/or recommendations and, where applicable, the establishment of temporary additional margins on the parameters estimated by the Bank.

a) Organization

The tools and processes used to calculate credit-risk- weighted assets, and the publication of statements that optimize credit risk control, are the responsibility of the Customers and Operations division.

Consolidation of the solvency ratio, production of regulation statements and measurement of internal capital are the responsibility of the Accounting and Performance Control division.

b) Information system

The centralized database of risks (BCR) stores credit risk data coming from acceptance, management and accounting applications, on the three markets and for the most significant countries.

This database provides input data for decision-makers to assess risks, and the Risk AuthoritY software package (RAY) calculates the solvency ratio. RAY is also fed by data from the KTP Cristal refinancing operations and consolidation tool.

The data collected and calculated in these information systems is controlled technically and functionally throughout the production line, from gathering information from upstream systems to the end results. These quality controls are monitored monthly at the level of the production chain according to the criticality of the data.

Further to an analysis of these controls, action plans have been put in place.

The information system in place provides the data dimensions needed to analyze the ratio. For instance, monthly statements show the components of weighted assets in respect of the advanced method (probability of default, loss given default, exposures, expected losses, etc.) according to several criteria:

- Sound outstandings and defaulted outstandings broken down by type of financing;
- A separation between balance sheet and off-balance sheet exposures;
- A breakdown by country;
- A breakdown by customer category (individuals, self- employed persons, small companies, medium-sized and large companies according to turnover, very big corporations and the dealership network);
- A distribution according to customer characteristics (age of the customer or company, line of business, etc.), according to the characteristics of the financing plan (initial term, amount paid up front, etc.) and according to the characteristics of the financed good (new or used vehicle, models, etc.).

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[2] For these 6 countries, some portfolios are in standard approach (examples: Corporates in the United Kingdom, Large Corporates outside France). Furthermore, RCI Korea is not concerned by the dealer financing activity.

These data dimensions are also used for the monthly analysis of the management cost of risk.

c) Segmentation of exposures by the advanced method

All figures relating to credit risk exposures concern gross exposures, i.e. before application of Credit Conversion Factors and Credit Risk Mitigation techniques.

The RWA density (weighted risks/exposures) totals 39% for the Retail Customer portfolio and 49% for the overall Corporate portfolio using the advanced internal rating method and 97% for the basic internal rating method.

The conversion factors applied to off-balance sheet unit exposures are regulatory rates (exclusively 100%). The calculated average rates are at 100% for the customer financing commitments (representing €953m), and 100% for the corporate approvals (representing €665m).

IV-99 CR6 IRB approach – Credit risk exposures by portfolio and PD range

In Millions of euros PD scale	Original on-balance sheet gross exposure	Off-balance sheet exposures pre CCF	Average CCF	EAD post CRM and post-CCF	Average PD	Number of obligors	Average LGD	Average maturity (Years)	RWA	RWA density	EL	Provisions
Portfolio Corporates FIRB												
0.00 to <0.15	8			8	0,03%	28	45,00%	2,5	1	15,31%		
0.15 to <0.25												
0.25 to <0.50	35			35	0,35%	16	45,00%	2,5	22	62,28%	0	
0.50 to <0.75												
0.75 to <2.50	118			118	1,08%	66	45,00%	2,5	116	98,60%	1	
2.50 to <10.00	35			35	3,48%	8	45,00%	2,5	50	141,81%	1	
10.00 to <100.00	0			0	17,86%	2	45,00%	2,5	0	242,86%	0	
100.00 (Default)	0			0	100,00%	4	45,00%	2,5			0	
Sub-total Corporate FIRB	**196**			**196**	**1,58%**	**124**	**45,00%**	**2,5**	**189**	**96,63%**	**1**	
Portfolio Corporates AIRB												
0.00 to <0.15	294	52	100%	346	0,04%	496	38,72%	2,0	42	12,11%	0	0
0.15 to <0.25												
0.25 to <0.50	1 547	79	100%	1 509	0,36%	641	19,83%	1,4	341	22,61%	1	-1
0.50 to <0.75	2 258	63	100%	1 860	0,73%	452	16,04%	1,4	403	21,65%	2	-2
0.75 to <2.50	4 683	260	100%	4 943	1,29%	4 406	23,27%	1,3	2 150	43,51%	14	-10
2.50 to <10.00	2 500	176	100%	2 563	4,76%	2 407	26,34%	1,5	1 932	75,40%	28	-15
10.00 to <100.00	322	34	100%	356	28,02%	441	37,22%	1,9	652	183,39%	40	-17
100.00 (Default)	60	1	100%	61	100,00%	145	93,61%	1,3	169	277,70%	44	-32
Sub-total Corporate AIRB	**11 664**	**665**	**100%**	**11 637**	**3,14%**	**8 988**	**23,60%**	**1,4**	**5 690**	**48,89%**	**129**	**-76**
Portfolio Retail												
0.00 to <0.15	3 127	124	100%	3 251	0,12%	519 342	44,94%		429	13,18%	2	-2
0.15 to <0.25	1 586	164	100%	1 750	0,22%	265 438	36,20%		281	16,06%	1	-1
0.25 to <0.50	3 489	89	100%	3 577	0,31%	389 273	47,04%		954	26,66%	5	-4
0.50 to <0.75	4 970	135	100%	5 105	0,53%	398 081	35,57%		1 440	28,21%	10	-12
0.75 to <2.50	9 582	316	100%	9 898	1,19%	779 182	44,87%		4 863	49,13%	54	-76
2.50 to <10.00	3 097	114	100%	3 211	4,46%	245 676	42,50%		1 946	60,61%	61	-57
10.00 to <100.00	881	11	100%	892	24,16%	76 380	43,81%		866	97,11%	95	-93
100.00 (Default)	411	1	100%	412	100,00%	50 622	84,56%		166	40,29%	345	-299
Sub-total Retail	**27 143**	**953**	**100%**	**28 096**	**3,32%**	**2 723 994**	**43,20%**		**10 945**	**38,96%**	**573**	**-544**
Total (all portfolios)	**39 002**	**1 618**	**100%**	**39 928**	**3,26%**	**2 733 106**	**37,50%**		**16 824**	**42,14%**	**704**	**-620**

d) Borrower data dimension - Probability of Default (PD) parameter

Monthly revaluation of customer risks is based on:

- A model for ranking the risk of default;
- A method for quantifying the related probability of default.

i) Risk ranking model

The ranking of counterparty risk results from a score that includes both the customer's characteristics and the latter's payment record. The methodology is adjusted to each customer typology to factor in the nature of the available information generally used by business experts to assess the risks.

The table below provides the mapping of the developed models.

ii) Allocation to a class of risk and quantification of the PD related to each class

The rating scales feature a number of classes adjusted to the granularity of the portfolio. Retail customers are divided into ten classes for the sound portfolio and one default class; Corporate and Dealer portfolios are divided into seven classes.

The required degree of reliability for internal rating has nonetheless meant that each "country/customer segment" portfolio has been broken down in a specific manner: for a given segment, the risk attached to a particular class in France, measured by its representative PD, is different from the risk attached to the same class in Spain.

The PD associated with each class is calculated by factoring in historically observed default rates.

IV-20 Segmentation of exposures by the advanced method and average PD by country

Category of exposure	IRBA countries	Average sound portfolio PD at 31/12/2019
Retail customers	Germany	1.22%
	Spain	1.17%
	France	1.85%
	Italy	1.49%
	United Kingdom	2.02%
	South Korea	0.97%
Small and medium-sized companies	Germany	2.01%
	Spain	3.78%
	France	3.56%
	Italy	4.66%
	United Kingdom	1.43%
	South Korea	1.25%
Large corporations	Germany	2.44%
	Spain	4.88%
	France	3.07%
	Italy	3.69%
	United Kingdom	1.07%

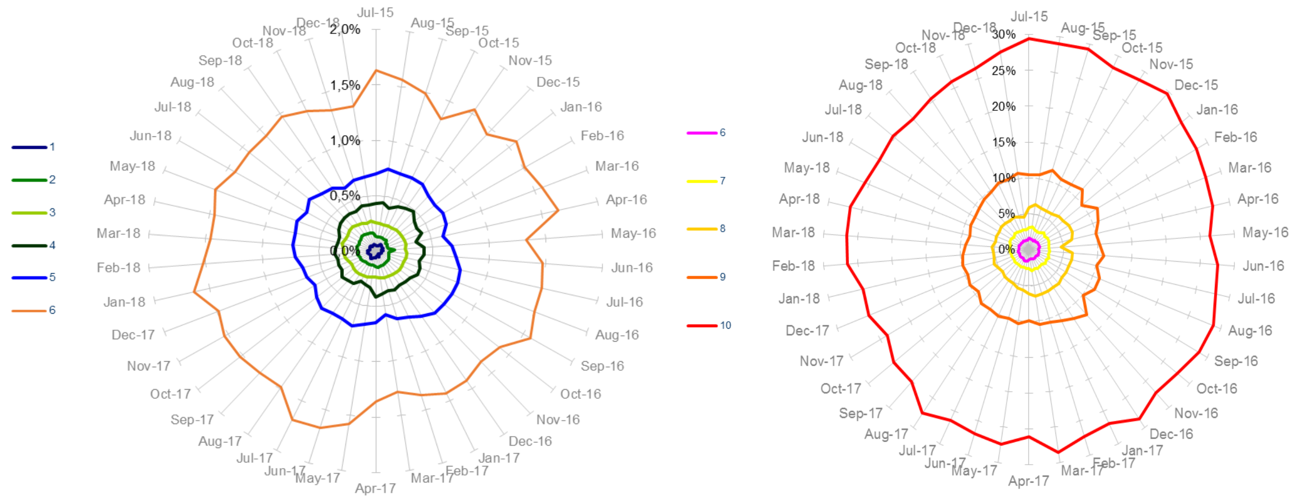
iii) Testing PD models

The figures disclosed in this section come from the backtesting databases, which are in line with the modeling databases. The figures given in the previous sections correspond to the use of parameters, and so there may be differences in management rules. For example, the default rates and PDs derived from the backtesting are based solely on the performing portfolio. In addition, in backtesting, if a counterparty belongs to a consolidation group whose annual sales exceed 50 million euros, the exposure class for the group's components will not be impacted, which can cause volume and allocation differences.

In many countries, backtesting of PD models has underlined that the models can effectively prioritize risks but that they also overestimate PDs per class. It should be noted that the internal backtesting procedures focus on calibrations by class of risk over time and not by class of exposure with PD averages in numbers and not in outstandings.

This is illustrated in the following graphs.

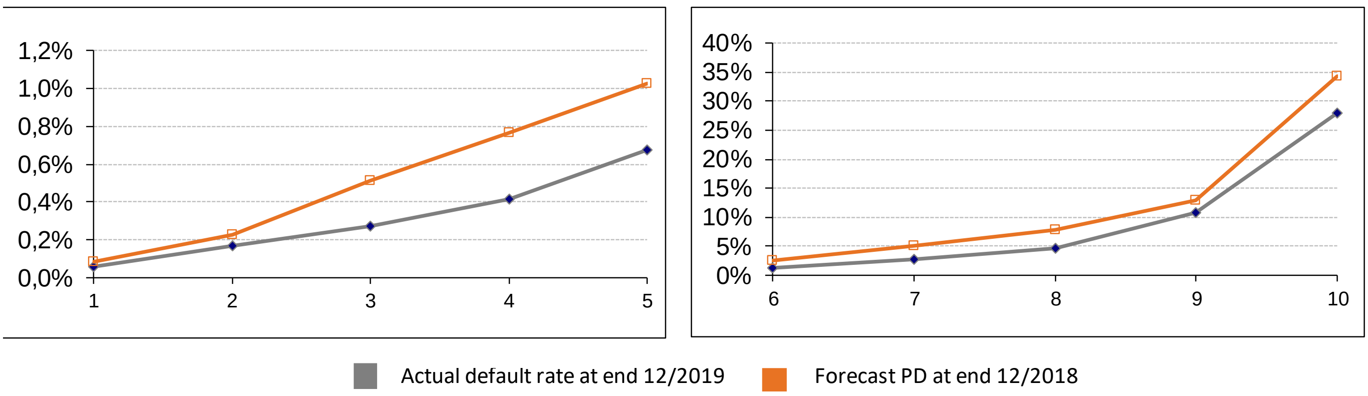
IV-21 History of default rates per class



Since the curves by rating class are concentric, the two graphs above enable to conclude that the model is discriminant.

IV-22 Backtesting of Consumer PD model for Germany at end-December 2019

Class 1 to 5 **Class 6 to 10**



The amber curve of calibrated PDs for the range of ratings under consideration is strictly above the actual default rate observed. The Consumer PD model for Germany is therefore adequately calibrated at the end of December 2019.

When external ratings are available (i.e. for the very big French corporations), a migration matrix between internal and external ratings is calculated for backtesting exercises. An annual match rate is calculated according to the following two scenarios: without a rating difference and with a rating difference in absolute value (nearly 99%).

IV-2310 CR9 - IRB approach – Backtesting of PD per exposure class

	At the end of previous year (31/12/2018)		Number of obligors				
Exposure class	Weighted average PD	Arithmetic average PD by obligors	End of previous year (31/12/2018)	End of the year (31/12/2019)	Default obligors in 2019	Of which new obligor in 2019	AVERAGE historical annual defaut rate
Retail individuals	1,09%	1,54%	2 410 983	2 545 670	22 542	1 436	1,21%
SME	4,91%	3,46%	168 483	173 918	3 327	273	2,76%
Large companies	1,69%	1,69%	1 822	1 889	18	1	0,51%
Dealers	2,08%	2,77%	1 932	1 877	14	0	1,81%

In accordance with RCI practice, the historical average captures maximum historical depth and is therefore not restricted solely to the last five years.

Across all exposure class, PDs are greater than the default rate. Moreover, quarterly backtesting of PD models, enables to ensure internal models performance: conservatism, discriminatory power and stability.

e) Transaction data dimension – Loss given default (LGD) parameter

Economic losses are estimated using discounted recovery flows for Retail Customers and Corporates, or debt write- offs for the car dealers, on the basis of historical data generally going back at least 7 years. Recovery costs are factored in according to the management phases involved. After analysis, transactions have been grouped into segments representing homogeneous loss levels.

The quantifying of these losses per segment results from a statistical model the main vectors of which are a generational analysis of recoveries and the speed of collection.

IV-24 Segmentation of exposures by the advanced method and average LGD by country

Category of exposure	IRBA countries	Population group segmentation	Type of model	Intenal/External model	Average sound portfolio LGD	Average loss computed at the last backtesting
Retail individuals SME Large companies	France	Credit	Statistical	Internal	43,00%	37,54%
		Leasing			44,90%	34,53%
	Germany	Credit	Statistical	Internal	22,40%	17,91%
		Leasing			32,30%	34,70%
	Spain	Credit VN	Statistical	Internal	47,60%	32,19%
		Credit VO			54,47%	37,77%
		Leasing			49,30%	10,43%
	Italy	Single segment	Statistical	Internal	53,20%	28,76%
	United Kingdom	Single segment	Statistical	Internal	49,30%	41,09%
	South Korea	Single segment	Statistical	Internal	52,00%	48,46%
Dealers	G5(*)	R1 VN	Combined	Internal	12,10%	8,60%
		R1 others			22,90%	16,34%
		R2			21,00%	13,30%

(*) G5: France, Germany, Spain, Italy, United Kingdom

The LGDs are updated yearly to factor in the most recent information when estimating the parameter. The principle of LGD backtesting is to compare the long run average of loss rate and the LGD calibrated in the previous year. The LGDs observed are conservative overall, despite an overshoot observed in one of the segments of German Retail, SME and Corporate Customers portfolio. It should be noted that changes to the retail LGD models were validated by the ECB at the beginning of 2020, and will go into production during 2020.

The average loss given defaults on the sound portfolio is 42.56% for Retail Customers and 27.36% for the Corporate segment, the latter breaking down as 43.78% for non-Dealer companies and 15.43% for the Dealers.

Customer expected loss (EL) increased by 5.0% compared to December 2018 (+ €31 million), mainly due to the increase in default EL (up by 8.9%): this change is explained by the increase in the default portfolio in terms of amount (€430.1 million of EAD in December 2019 vs. €401.1 million in December 2018). Moreover, default LGD deteriorated by 131 bps, contributing to the increase in default EL. Healthy EL rose by only +0.6%.

f) Operational use of internal ratings

i) Customers

- Granting policy

Customers applying for financing plans are systematically rated by acceptance specific scoring; this situation, which pre-dated the “Basel” ratings, allow to set the initial direction of the application in the decision-making process, the study process concentrating on “intermediary and high” risks. Consistency between the acceptance rating and the “Basel” rating is ensured both in the construction of the rating models and in backtesting exercises. Beyond the operational process, the acceptance policy is regularly adjusted according to default rates and a break-even analysis by level of probability of default and loss given default.

- Debt collection

The statistical models used to calculate weighted risks and expected loss enable probability of default determined at the time of granting to be updated monthly by factoring in the customer's payment record. This updating, which provides a clear vision of expected loss of the portfolio as part of the “budget process” is also a tool used to forward plan the activity of out-of-court and disputed debt collection platforms. On the basis of the same customer information, “recovery scores” have been deployed in Spain and South Korea to make the process more efficient.

ii) Dealers

In the Dealers segment, all counterparties are systematically rated. All the rating components, or the rating itself, are included in the key operational processes of acceptance, management and monitoring of the activity and the risks.

Provisioning for the Wholesale financing activity is based on a categorization of the counterparties, individually, and on the basis of an examination of objective impairment indicators. The internal rating is the basis for this differentiation.

g) Procedures for monitoring internal ratings

The results of the internal rating process, the performance of the models and the main data items making it up are monitored quarterly by the modeling teams. At least once a year, observed changes lead to a formal analysis according to a standard protocol described in a procedure. Differences between the models' forecasts and the actual figures are analyzed and summarized in a formal report that also includes a quantification of the impact on the capital requirement. Elements of the performance of the rating models are also reported twice a year to the Executive Committee during a dedicated presentation.

Regulatory changes with a significant impact on the models are monitored and analyzes in detail by the modeling teams. This is notably the case for the EBA Regulatory Technical Standards (RTS) on the new definition of default for which a global project is underway within the Group to integrate the impacts on the models used and adapt operational processes.

Furthermore, the various elements of internal rating and of tests of the process produced by the modeling teams are reviewed independently by the model validation team of the Risk Control Unit to ensure their adequacy and their regulatory compliance.

IV-115 CR8 - RWA flow statements of credit risk exposures under the IRB approach

The purpose of this section is to depict the root cause of RWA variation by quarterly step.

In million of euros	RWA amounts	Capital requirements
RWA at 30/06/2019	**16 434**	**1 315**
Asset size	-209	-17
Asset quality	-29	-2
Model updates	0	0
Methodology & policy	0	0
Acquisitions and disposals	0	0
Foreign exchange movements	28	2
Other	0	0
RWA at 30/09/2019	**16 223**	**1 298**

In million of euros	RWA amounts	Capital requirements
RWA at 30/09/2019	**16 223**	**1 298**
Asset size	749	60
Asset quality	-244	-20
Model updates	0	0
Methodology & policy	0	0
Acquisitions and disposals	0	0
Foreign exchange movements	96	8
Other	0	0
RWA at 31/12/2019	**16 824**	**1 346**

The upward variation in RWAs between the last two quarters is due to the increase in outstandings on the portfolio under the advanced model and foreign exchange rates fluctuations.

6 - STANDARDIZED METHOD

The credit risk exposures treated using the standardized method comprise financed sales outstandings of subsidiaries not treated using the advanced method, debts to credit institutions and central banks, and all other consolidated assets that are not credit obligations.

In order to calculate the capital requirement for credit risk under the standardized method, RCI Banque uses Moody's, the external credit rating agency, for sovereigns, international organizations, and corporate establishments and investments. Reconciliation of these ratings with the credit quality steps provided for under the regulations complies with the supervisor's requirements. Beyond this framework, there is no use of any external rating that cannot be applied directly. As regards unrated exposures, the RCI Banque group applies the regulatory weightings in accordance with the CRR.

For hedge transactions, the values of counterparty credit risk exposures on interest-rate or forex derivatives are determined by the market price method, adding, to the current replacement cost, the potential future credit exposure based on the remaining term. Such transactions still concern countries not covered by EMIR regulations.

IV-26 CR4 - Standardized approach – Credit risk exposure and Credit Risk Mitigation (CRM) effects

In Millions of euros	Exposures before CCF and CRM		Exposures post-CCF and CRM		RWA and RWA density	
	On-balance sheet	Off-balance sheet	On-balance sheet	Off-balance sheet	RWA	RWA density
Central governments or central banks	3 180	18	3 180	9	430	13,48%
Regional government or local authorities	39	131	39	66	21	20,00%
Public sector entities	0		0		0	100,00%
Multilateral development banks						
International organisations	15		15			
Institutions	1 555	28	1 555	13	490	31,25%
Corporates	5 762	486	5 578	174	5 750	99,97%
Retail	6 672	444	6 672	336	5 056	72,15%
Secured by mortgages on immovable property						
Exposures in default	88	0	75	0	93	123,05%
Higher-risk categories						
Covered bonds						
Institutions and corporates with a short-term credit assessment	115	32	115	8	154	125,03%
Collective investment undertakings	80		80		80	100,00%
Equity	221		221		547	247,92%
Other items	1 739	14	1 739	14	1 459	83,24%
Total	**19 466**	**1 153**	**19 269**	**619**	**14 079**	**70,79%**

CRM: Credit Risk Mitigation

CCF: Credit Conversion Factor

IV-27 CR5 - Standardized approach – Exposures by asset classes and risk weights

In Millions of euros									Risk weight								
Asset classes	**0%**	**2%**	**4%**	**10%**	**20%**	**35%**	**50%**	**75%**	**100%**	**150%**	**250%**	**370%**	**1250%**	**Others**	**Deducted**	**Total**	**of which unrated**
Central governments or central banks	3 000						3		19	8	159					3 189	
Regional government or local authorities					105											105	105
Public sector entities									0							0	0
Multilateral development banks																	
International organisations	15															15	
Institutions					1 234		181		153							1 568	1 269
Corporates					17		65		5 572	98						5 752	5 670
Retail								7 008								7 008	7 008
Secured by mortgages on immovable property																	
Exposures in default									41	35						75	75
Higher-risk categories																	
Covered bonds																	
Inst. and corporates with a ST credit assessment					23		1			99						123	99
Collective investment undertakings									80							80	80
Equity									3		217					221	221
Other items	0				367				1 386							1 753	1 753
Total	**3 016**				**1 745**		**251**	**7 008**	**7 253**	**239**	**377**					**19 888**	**16 280**

7 - CREDIT RISK MITIGATION TECHNIQUES

RCI Banque group does not use netting agreements to reduce the commercial credit risk.
Mitigation techniques are allowed only in the form of cash and used solely according to the two agreements below in order to hedge the credit risk specific to the manufacturers' distribution network.

For exposures treated by the internal rating method, the capital requirements in respect of credit risk take into account financial collateral (in the form of a cash pledge agreement) amounting to €700m granted by manufacturer Renault and protecting RCI Banque against the risk of the Renault subsidiaries defaulting on inventory financing. This protection is spread evenly over each exposure in the relevant scope by RAY's data processing. At the end of December 2019 and after application of the discount relating to the asymmetry of currencies, the impact on the value of €722m of exposures (corporate category only) totaled €692m.

With the standardized method, capital requirements in respect of credit risk include financial collateral (in the form of *Letras de Cambio*) protecting Brazilian subsidiary Banco RCI Brasil against the risk of default of its network of dealerships, for a total of €197m at the end of December 2019, reducing exposures to €35m for the corporate category, to €200m for SMEs. This protection is allocated individually to each exposure concerned.

IV-2812 CR7 - IRB – Effect on RWA of credit derivatives used as CRM techniques

In Millions of euros	**Pre-credit derivatives RWA**	**Actual RWA**
Exposures under FIRB		
Central governments and central banks		
Institutions		
Corporates – SMEs		
Corporates – Specialised lending		
Corporates – Other	189	189
Exposures under AIRB		
Central governments and central banks		
Institutions		
Corporates – SMEs	1 385	1 385
Corporates – Specialised lending		
Corporates – Other	4 305	4 305
Retail – Secured by real estate SMEs		
Retail – Secured by real estate non-SMEs		
Retail – Qualifying revolving		
Retail – Other SMEs	1 278	1 278
Retail – Other non-SMEs	9 667	9 667
Equity IRB		
Other non credit obligation assets		
Total	**16 824**	**16 824**

8 - COUNTERPARTY CREDIT RISK

COUNTERPARTY RISK MANAGEMENT

RCI Banque is exposed to non-commercial credit risk (or counterparty risk), which arises in the management of its disbursements and its investments of cash surpluses, as well as the management of its foreign exchange risk or interest rate hedges, in the event that the counterparty were to default on its commitments in such types of financial transactions.

Counterparty risk is managed by a limit system set by RCI Banque, then validated by its shareholder as part of Groupe Renault's counterparty risk consolidation. Limits are calibrated using an internal method based on the amount of own equity, the "long term" rating by rating agencies and appraisal of the quality of the counterparty. They are monitored daily and all control results are notified monthly to the RCI Banque's financial committee and are included in Groupe Renault consolidated counterparty risk monitoring.

Counterparty risk mitigation techniques are used for market transactions to protect the company in part or in full against the risks of insolvency of counterparties.

RCI Banque negotiates its interest rate and forex derivatives used as asset and liability hedges under an ISDA agreement or equivalent and thereby has a legally enforceable right in case of default or a credit event (see Note 20 to the consolidated financial statements: Netting agreements and other similar commitments). In 2012 the EMIR (European Market Infrastructure Regulation) regulation published a series of measures designed to improve the stability and transparency of the derivatives market. The main measure concerns the use of clearing houses for transactions on derivatives and the collateralization of the said transactions. In Europe, RCI Banque books standardized interest-rate swap transactions in clearing houses. These transactions consist in deposits of an initial margin and regular exchanges of collateral in respect of variation margins. Foreign exchange derivatives uncollaterized are subject to bilateral margin call;

- Investments in securities are not hedged, in order to reduce credit exposure.

RCI Banque has no particular mechanism for managing correlation risk.

If its credit rating is downgraded, RCI Banque may be led to fund additional reserves as part of its securitization transactions. At 31 December 2019, the cash outflows required to fund such additional reserves should the three-star rating be downgraded totaled €117 million.

EXPOSURE TO COUNTERPARTY CREDIT RISK

IV-139 CCR1 - Analysis of counterparty credit risk (CCR) exposure by approach

In Millions of euros	Notional	Replacement cost/current market value	Potential future exposure	EEPE	Multiplier	EAD post-CRM	RWA
Mark to market							
Original exposure							
Standardised approach		270				270	103
IMM (for derivatives and SFTs)							
Of which securities financing transactions							
Of which derivatives and long settlement transactions							
Of which from contractual cross-product netting							
Financial collateral simple method (for SFTs)							
Financial collateral comprehensive method (for SFTs)							
VaR for SFTs							
Total							**103**

RWAs on counterparty credit risk are based on exposure on derivatives, to which an add-on is allocated. The exposure is then weighted by risk in accordance with the standard method – based on counterparties' credit quality.

IV-30 CCR3 – Standard approach – CCR exposures by regulatory portfolio and risk weights

In Millions of euros	Risk weight									
	0%	10%	20%	50%	75%	100%	150%	Others	Total	Of which unrated
Central governments or central banks										
Regional government or local authorities										
Public sector entities										
Multilateral development banks										
International organisations										
Institutions			21	74		5			101	5
Corporates										
Retail										
Inst. and corporates with a ST credit assessment			2	0					3	
Other items										
Total			**23**	**75**		**5**			**103**	**5**

IV-31 CCR5-A - Impact of netting and collateral held on exposure values

In Millions of euros	Gross FV or net carrying amount	Netting benefits	Netted current credit exposure	Collateral held	Net credit exposure
Derivatives	270	37	233	179	54
SFTs					
Cross-product netting					
Total	**270**	**37**	**233**	**179**	**54**

IV-32 CCR5-B - Composition of collateral for exposures to CCR

In Millions of euros	Collateral used in derivative transactions				Collateral used in SFTs	
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received	Fair value of posted collateral
	Segregated	Unsegregated	Segregated	Unsegregated		
Cash – domestic currency		179	62	10		
Cash – other currencies			4			
Domestic sovereign debt						
Other sovereign debt						
Government agency debt						
Corporate bonds						
Equity securities						
Other collateral						10
Total		**179**	**66**	**10**		**10**

IV-33 CCR8 - Exposures to CCPs

In Millions of euros	**EAD (post-CRM)**	**RWA**
Exposures to QCCPs (total)		**13**
Exposures for trades at QCCPs (excluding initial margin and default fund contributions)	4	1
(i) of which OTC derivatives	*4*	*1*
(ii) of which Exchange-traded derivatives		
(iii) of which Securities financing transactions		
(iv) of which Netting sets where cross-product netting has been approved		
Segregated initial margin	62	
Non-segregated initial margin		
Prefunded default fund contributions		
Alternative calculation of own funds requirements for exposures		
Exposures to non-QCCPs (total)		
Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions)		
(i) of which OTC derivatives		
(ii) of which Exchange-traded derivatives		
(iii) of which Securities financing transactions		
(iv) of which Netting sets where cross-product netting has been approved		
Segregated initial margin		
Non-segregated initial margin		
Prefunded default fund contributions		
Unfunded default fund contributions		

V - CREDIT VALUATION ADJUSTMENT RISK

For all over-the-counter derivatives, if derivatives recognized as credit protection are not used, the RCI Banque group determines a capital requirement for “Credit valuation adjustment” (CVA) risk.

This capital charge is designed to cover losses in the event of downgraded quality of the counterparty, entailing a decrease in the value of the derivatives.

The requirement is calculated by the standardized method defined in Article 384 of regulation (EU) 575/2013.

V-1 CCR2 - Credit valuation adjustment (CVA) capital charge

In Millions of euros	Exposure value	RWA
Total portfolios subject to the Advanced CVA capital charge		
(i) VaR component (including the 3×multiplier)		
(ii) Stressed VaR component (including the 3×multiplier)		
All portfolios subject to the Standardised CVA capital charge	270	158
Based on the original exposure method		
Total subject to the CVA capital charge	**270**	**158**

VI - SECURITIZATION

RCI Banque uses securitization as an instrument of diversification of its refinancing. RCI Banque acts exclusively with a view to refinancing its activities and does not invest in special purpose vehicles whose underlying obligations are originated by non-group companies.

In respect of its refinancing activities, the group securitizes some of its pools of receivables granted to individual customers or companies. Securities created for such transactions allow the group either to refinance itself or to increase its pool of assets that can be used as collateral with the European Central Bank.

In respect of prudential regulations, no transfer of risk deemed significant has been observed further to these transactions. They have no impact on the group's regulatory capital. Vehicles bearing assigned receivables are consolidated by the group. The group remains exposed to most of the risks and benefits attached to such receivables; furthermore, the latter cannot in parallel be the subject of a guarantee given or firm assignment as part of another transaction.

The group's securitization transactions all meet the economic capital retention requirement of not less than 5% mentioned in Article 405 of European Directive (EU) 575/2013.

The sales refinancing receivables retained in the balance sheet totaled €10,508m on 31 December 2019 (€11,010m on 31 December 2018), namely:

- for securitizations placed on the market: €1,913m
- for self-subscribed securitizations: €6,121m
- for private securitizations: €2,473m

The stock of securitized assets is itemized in Note 13 of the consolidated financial statements. At 31 December 2019, funding secured through private securitizations totaled €1,543m, and funding secured through public securitizations placed on the markets totaled €1,700m.

VII - MARKET RISK

1 - THE MARKET RISK MANAGEMENT PRINCIPLE

The goals and strategies pursued by RCI Banque in connection with market risk are described in the part entitled "Consolidated financial statements – financial risks" – Appendix 2.

In the absence of a trading book, all the market risk arises from the group's foreign exchange position. This is explained by the structural foreign exchange exposure on the equity interests in subsidiaries outside the Eurozone. RCI Banque is exposed to the risk of variation in foreign exchange parities that can adversely affect its financial position.

The specific market risks control process is part of the RCI Banque group's overall internal control process.

2 - GOVERNANCE AND ORGANIZATION

For the RCI Banque group's entire scope of consolidation, the management of market risks (overall interest rate risk, liquidity and foreign exchange risk) and due observance of the related limits are placed under the supervision of RCI Banque's Financing and Group Treasury division, which manages them directly for subsidiaries refinanced centrally or indirectly through a reporting process and monthly committee meetings for subsidiaries refinanced locally. The system of limits that controls the process is approved by the Board of Directors and periodically updated.

A list of authorized products, approved by RCI Banque's Financial Committee, specifies the foreign exchange and interest rate instruments and the nature of currencies liable to be used for market risk management purposes.

3 - MEASUREMENT, MONITORING AND PRUDENTIAL TREATMENT

The Financial Risks Team, attached to the Risk and Banking Regulation Department (Risk Division), issues a daily report and monitors the group's exposure to financial risks.

Since May 2009, RCI Banque has been authorized by the French Prudential Supervision and Resolution Authority to exclude long-term and structural assets from its foreign exchange position. Accordingly, as the foreign exchange position is under the 2% threshold of own funds as defined in Article 351 of Regulation (EU) 575/2013, RCI Banque does not calculate capital requirements in respect of foreign exchange risk.

4 - EXPOSURE

The sales financing entities are obliged to refinance themselves in their own currency and are thus not exposed to foreign exchange risk. RCI Banque's residual exposure on other assets and liability items (e.g. ICNE on loans in foreign currencies) is not material for RCI Banque. At 31 December 2019, the RCI Banque group's consolidated foreign exchange position totaled €7 million.

Finally, the own funds and annual earnings of RCI Banque entities outside the Eurozone are themselves subject to foreign exchange fluctuations and are not specifically hedged.

VIII - INTEREST-RATE RISK FOR PORTFOLIO POSITIONS

1 - ORGANIZATION OF INTEREST RATE RISK MANAGEMENT

The overall interest rate risk represents the impact of fluctuating rates on the economic value and future incomes. The objective of the RCI Banque group is to mitigate this risk as far as possible. The specific interest rate risk control process is part of the RCI Banque group's overall internal control process. The goals and strategies pursued by RCI Banque in connection with the interest rate risk are described in the part entitled “Consolidated financial statements – financial risks”. – Appendix 2.

2 - GOVERNANCE AND ORGANIZATION

The Financing and Group Treasury division refinances group entities that are eligible for centralized refinancing. It borrows the funds needed to ensure the continuity of business (bond and negotiable debt instrument issues, securitizations, interbank loans, etc.), balances assets and liabilities and adjusts the cash position of group companies, while managing and minimizing exposure to portfolio interest rate risk by using appropriate hedging instruments (interest rate swaps, cross-currency swaps and spot and forward exchange transactions). The principles of financial policy extend to all RCI Banque group consolidated subsidiaries and are adapted in locally refinanced subsidiaries. The latter are subject to the same financial risk monitoring requirements as the group's other subsidiaries: compliance with interest rate and forex risks limits, monitoring liquidity risk, limiting counterparty risk and specific monitoring by a dedicated Financial Committee and ad hoc reporting.

Transactions in financial instruments made by the RCI Banque holding company essentially relate to its function as the group's central refinancing service. In order to take into account the difficulty of precisely adjusting the structure of borrowings with that of loans, limited flexibility is accepted in interest rate risk hedging for each subsidiary. This flexibility consists in a sensitivity limit being assigned to each subsidiary as approved by the Financial Committee, an individual adaptation of the overall limit set by RCI Banque's Board of Directors.

A group management system performs a daily calculation of each entity's balance sheet sensitivity to variations in yield curve.

The Financial Risks Team controls group exposure as measured by this system and observance of the sensitivity limits assigned to each entity.

3 - MEASUREMENT AND MONITORING

Interest rate risk is monitored on a daily basis: a sensitivity calculation per currency, per management entity and per asset portfolio verifies that each entity complies with the individual limits assigned to it. This sensitivity to interest rate risk is measured using a methodology common to the entire RCI Banque group. The process keeps overall group exposure and the exposure of each entity at a low level.

Two indicators are monitored internally for interest rate risk:

- EV sensitivity (Economic Value) measures at a given point in time (t) the impact of a change in interest rates on the market price of an entity's balance sheet. The economic value is determined by discounting future cash flows at market rates. This measurement is used to set the limits that apply to the group's entities.
- Net Interest Income measures gains or losses following a shock of the interest rate curve, based on an income statement view. It is presented as the difference in future interest income over a defined horizon. The particularity of net interest income sensitivity, compared with the discounted vision of sensitivity, is the linearization of the impact of new transactions.

Two horizons are defined:

- 12-month sensitivity of the net interest income (NII - indicator framed by internal limits),
- Sensitivity of the net interest income (NII) over the entire balance sheet schedule

Different yield curve variation scenarios are considered, including different shocks of which:

- The shock of 100 bps, used for the management of internal limits,
- The shock following a 50 bps yield curve rotation around the 2-year point.

Calculations are based on average monthly asset and liability gaps (gap excluding interest amounts) which incorporate fixed-rate transactions and floating rate transactions until their next review date.

Maturities of outstanding are determined by taking into account the contractual characteristics of operations and the results of the modeling of historical customer behavior patterns (early repayment, etc.). Most of RCI’s subsidiaries apply an early repayment rate calculated via a moving average based on historical observations over 12 months. Some subsidiaries apply a survival curve based on a statistical assessment.

In December 2019, the Group Financial Committee validated the standardization of the methodology used to calculate early repayments at a rolling average over 12 months for the entire group.

To calculate interest rate risk measurement indicators, deposits are modeled as fixed-rate resources with an initial maturity of 3 months. The instantaneous duration is therefore approximately 1.5 months.

Measurements of NII sensitivity to calculate internal indicators, also take into account an allocation of entity own funds to the financing of the longest term commercial assets.

Sensitivity is calculated daily per currency and per management entity (central financing office, French and foreign financing subsidiaries) and enables overall management of interest rate risk across the consolidated scope of the RCI Banque group. Monitoring is performed by the Financial Risk Team, which reports to the Risk and Banking Regulation Department. The situation of each entity, with regard to its limit, is checked daily, and immediate hedging directives are issued to the subsidiaries if circumstances so dictate. The results of the controls are the subject of monthly reporting to the Financial Committee, which verifies due observance of the limits by the group's various entities, and of current procedures. Interest rate risk measurement indicators are presented quarterly to the Board of Directors' Risk Committee.

In accordance with regulatory changes (EBA/GL/2018/02), RCI Banque also measures the sensitivity of the economic value of equity (EVE – indicator with internal alert thresholds and regulatory limits) via a standard indicator (+/- 200 bps parallel) and a currency-differentiated indicator with 6 scenarios.

These regulatory indicators are computed quarterly and presented annually to the financial committee. They are reported in Statement VIIII-1 IRRBB1.

4 - EXPOSURE

Over the year 2019, RCI Banque's overall sensitivity to the interest rate risk remained below the limit set by the group at €50m in the event of a uniform shock of 100 bps on the whole of the yield curve.

Breakdown by currency of the sensitivity to NII following a 100- bps rise in rates (in MEUR) at 31 December 2019:

- €+0.9m in GBP,
- €+0.5m in KRW,
- €+0.2m in PLN,
- €+0.1m in MAD,
- €-0.5m in BRL,
- €-0.8m in CHF,
- €-0.9m in EUR

At 31 December 2019, the sum of sensitivities in each currency totaled -€0.5m, of which -€25.4m for the 12-month NII. The sum of the absolute values of sensitivities in each currency totaled €4.4m.

VIIII-1 IRRBB1 - Quantitative information on changes in economic value of equity and net interest income under each of the prescribed interest rate shock scenarios

31.12.2019	CRD 4: 200 bps standard shock	Supervisory outlier test: 200 bps standard shock	Supervisory outlier test: Currency adjusted shock					Internal indicators	
KEURO	Δ EVE	Δ EVE	Δ EVE with Floor				Total with CAP	NII 100 bps EUR [0 ; 12 months]	NII 100 bps EUR [0 ; 60 Months]
			EUR	GBP	BRL	KRW			
Parallel up	-433 064	-414 539	-326 502	-68 961	-31 957	-25 333	-452 754	-25 768	-552
Parallel down	433 064	91 202	142 905	23 385	31 957	7 220	102 733		
Steepener			129 826	10 996	3 807	4 804	74 717		
Flattener			-146 692	-23 661	-10 301	-9 788	-190 441		
Short rate up			-235 233	-44 079	-21 280	-18 110	-318 702		
Short rate down			142 905	26 892	21 280	3 272	97 174		
Maximum	**433 064**	**414 539**	**326 502**	**68 961**	**31 957**	**25 333**	**452 754**	**25 768**	**552**
OWN FUNDS	5 889 300	5 889 300							
CET1							5 349 700		
EVE coverage ratio	**7,35%**	**7,04%**					**8,46%**		
Regulatory limit	20%	20%					15%		

The above calculations are based on the standardized assumptions published by the EBA (EBA/GL/2018/02). Pursuant to the methodology, the positive impacts of each interest rate scenario are weighted 50% and the negative impacts taken at 100%.

The impact of an adverse interest rate movement on the total net interest margin is low, in line with the company's prudent management objectives. It is as a result significant for the Economic Value of Equity or EVE, an indicator which by definition does not take own funds into account, unlike the daily operational asset-liability management of interest rate risk.

IX - LIQUIDITY RISK

1 - THE LIQUIDITY RISK MANAGEMENT PRINCIPLE

Liquidity risk is defined as the risk of not being able to meet one's cash outflows or collateral requirements at a reasonable cost when they fall due. As liquidity is a rare resource, RCI Banque has a duty to have sufficient funds at all times to guarantee the continuity of its activity and development.

RCI Banque regularly strengthens its liquidity risk management process while complying with EBA recommendations. The Board of Directors and its Risks Committee approve the ILAAP ("Internal Liquidity Adequacy Assessment Process") and its procedural framework. These documents define the principles, standards and governance for liquidity risk management and the indicators and limits monitored within the RCI Banque group.

The group aims to optimize its cost of refinancing while controlling its liquidity risk and complying with regulatory requirements. RCI Banque also aims to have multiple sources of liquidity. As such, the financing plan is constructed with a view to diversifying liabilities, per product, currency and maturity.

2 - GOVERNANCE AND ORGANIZATION

Liquidity risk management principles and standards are laid down by the group's governance bodies:

- The Board of Directors sets the liquidity risk tolerance level (risk appetite) and regularly examines the group's liquidity position. It approves the methodology and the limits, and approves the annual bond issue ceiling.
- The Financial Committee, the group's financial risks monitoring body, controls liquidity risk according to the appetite for risk defined by the Board of Directors.
- The Finance and Group Treasury division implements liquidity management policy and fulfils the financing plan by factoring in market conditions, in accordance with internal rules and limits.
- Due observance of the limits is monitored by the Financial Risks Control unit.

As the Board of Directors and the Risks Committee have approved a low appetite for liquidity risk, the group sets itself strict internal standards to enable RCI Banque to maintain business continuity over a given period in stress scenarios. The Financial Committee is informed every month of the time frame during which the company can continue its business using its liquidity reserve in various stress scenarios. These scenarios include assumptions about mass withdrawals of deposits, lost access to new funding, partial unavailability of certain items of the liquidity reserve and forecasts of new credit production. The stressed mass withdrawals of deposits scenario is very conservative and is regularly backtested.

An established emergency plan identifies the action required in the event of stress on the liquidity position.

3 - MEASUREMENT AND MONITORING

The liquidity risk management process relies on risk indicators monitored every month by the Financial Committee. These indicators are based on the following elements:

Static liquidity

This indicator measures the gap between assets and liabilities on a given date without an assumed renewal of liabilities or assets. It materializes the static liquidity "gaps". The group's policy is to refinance its assets with liabilities having the same or longer maturities, thereby maintaining positive static liquidity gaps over the entire balance sheet.

The liquidity reserve

The group constantly aims to have a liquidity reserve consistent with the appetite for liquidity risk. The liquidity reserve comprises short term financial assets, high-quality liquid assets (HQLA), financial assets, collateral eligible for European Central Bank monetary policy transactions and confirmed bank lines of credit. It is controlled by the Financial Committee every month.

Stress scenarios

The Financial Committee is informed every month of the time frame during which the company can continue its business using its liquidity reserve in various stress scenarios. These scenarios include assumptions about mass withdrawals of deposits, lost access to new funding, partial unavailability of certain items of the liquidity reserve and forecasts of new credit production. The stressed mass withdrawals of deposits scenario is very conservative and is regularly backtested.

4 - REGULATORY RATIOS AND CHARGES ON ASSETS

Control of the group's liquidity also aims to meet regulatory liquidity coverage ratios (LCRs) and charges on assets (encumbered and unencumbered assets).

Liquidity Coverage Ratio (LCR)

The Liquidity Coverage Ratio (LCR) sets a minimum standard for bank liquidity. It is intended to ensure that a bank has an adequate level of unencumbered High Quality Liquid Assets (HQLA), which can be converted into cash to enable it to meet its liquidity needs for 30 calendar days in a stress scenario. The LCR is thus defined as the ratio of HQLAs to net cash outflows over the next 30 days. Net outflows represent the expected outflows less expected inflows or 75% of expected outflows, whichever is the lower.

RCI Banque's liquidity is managed by the Finance and Treasury Division that centralizes funding for European entities and oversees balance sheet management for all group entities throughout the world.

For each quarter, the following table shows the average values of HQLAs, Inflows and Outflows calculated as the simple average of month-end observations over the twelve months preceding the end of each quarter.

The bank's average HQLA during the 12-month period ending on 31 December 2019 was €1,897m. It amounted to €1,835m on average during the 12-month period ending on 30 September 2019. They mainly consisted of deposits with the European Central Bank and securities issued by governments or supranationals. On 31 December 2019, the average duration of the bond portfolio was close to 6 months.

In addition, RCI Banque also invested in a fund whose assets are made of debt securities issued by European agencies, sovereigns and supranational issuers. Its average exposure to credit risk is six years with a limit at nine years. The fund is aiming a very low exposure to the interest rate risk with a maximum of two years.

Over the 12-month period ending on 31 December 2019, EUR and GBP denominated HQLA represented on average 76.6% and 17.7% of total HQLA respectively. The weight of each currency remained stable compared to the averages of the 12-month period ending on September 2019, which were 77.9% for EUR and 15.6% for GBP.

RCI Banque Inflows mainly come from commercial and financial assets, while Outflows are mostly explained by debt repayment and the deposit run-off factor.

The liquidity requirement linked to derivative transactions is limited and represents non-material amounts.

The average LCR over the 12-month period ending on 31 December 2019 came at 239%, compared to 249% on average over the 12-month period ending on 30 September 2019.

IX-1 LIQ1 - Liquidity Coverage Ratio (LCR)

In millions of euros	Total unweighted value (average)				Total weighted value (average)			
Quarter ending on	**31/03/2019**	**30/06/2019**	**30/09/2019**	**31/12/2019**	**31/03/2019**	**30/06/2019**	**30/09/2019**	**31/12/2019**
Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
High-Quality Liquid Assets (HQLA)								
Total high-quality liquid assets					**1 609**	**1 741**	**1 835**	**1 897**
Cash Outflows								
Retail deposits and deposits from small business customers	12 624	12 710	12 818	13 073	1 319	1 329	1 341	1 367
Stable deposits								
Less stable deposits	*12 624*	*12 710*	*12 818*	*13 073*	*1 319*	*1 329*	*1 341*	*1 367*
Unsecured wholesale funding	709	767	840	889	506	575	659	725
Operational deposits and deposits in networks of cooperative banks								
Non-operational deposits (all counterparties)	*339*	*355*	*374*	*374*	*136*	*162*	*194*	*209*
Unsecured debt	*370*	*412*	*466*	*515*	*370*	*412*	*466*	*515*
Secured wholesale funding					44	42	41	45
Additional requirements	173	268	445	619	173	179	203	228
Outflows related to derivative exposures and other collateral requirements	*173*	*170*	*177*	*187*	*173*	*170*	*177*	*187*
Outflows related to loss of funding on debt products								
Credit and liquidity facilities		*99*	*267*	*432*		*9*	*26*	*41*
Other contractual funding obligations	1 523	1 471	1 383	1 312	463	451	460	472
Other contingent funding obligations	2 649	2 545	2 407	2 277	132	159	240	322
Total Cash Outflows					**2 636**	**2 735**	**2 944**	**3 158**
Cash Inflows								
Secured lending (eg reverse repos)								
Inflows from fully performing exposures	4 142	4 133	4 160	4 198	2 359	2 334	2 345	2 371
Other cash inflows	2 286	2 346	2 478	2 541	733	770	799	822
(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
(Excess inflows from a related specialised credit institution)								
Total Cash Inflows	**6 428**	**6 479**	**6 639**	**6 739**	**3 092**	**3 103**	**3 144**	**3 193**
Fully exempt inflows								
Inflows Subject to 90% Cap								
Inflows Subject to 75% Cap	*6 428*	*6 479*	*6 639*	*6 739*	*3 092*	*3 103*	*3 144*	*3 193*
Total HQLA					1 609	1 741	1 835	1 897
Total net Cash Outflows					659	690	743	796
Liquidity Coverage Ratio					**245%**	**253%**	**249%**	**239%**

(Un) encumbered assets

An asset is deemed "encumbered" if it serves as a guarantee or is used to securitize, collateralize or improve a transaction from which it cannot be separated. In contrast, an "unencumbered" asset is not subject to any legal, regulatory or contractual restriction limiting the institution's ability to do what it wants with it.

By way of example, the following types of contracts match the definition of encumbered assets:

- Assets sold to securitization vehicles when the said assets have not been derecognized by the company. The assets underlying self-subscribed securitizations are not considered encumbered, unless the securities are used as security or to guarantee another transaction in any manner (financing in its dealings with the central bank for instance),
- The collateral designed to reduce the counterparty risk on derivatives registered in a clearing house or bilaterally negotiated,
- Secured financing.

Disclosure on encumbered and unencumbered assets in the following three tables is calculated in accordance with EBA/GL/2014/03 guidelines. Reported figures are the median values of quarterly data on a rolling basis over the previous twelve months. Over the period ending on 31 December 2019, the median amount of assets encumbered in the form of disposals to a securitization vehicle or guarantee given is €8,339m, making up 14% of total assets.

IX -2 AE1 - Encumbered and unencumbered assets

In millions of euros	Carrying amount of encumbered assets	ow notionally elligible EHQLA and HQLA	Fair value of encumbered assets	ow notionally elligible EHQLA and HQLA	Carrying amount of unencumbered assets	ow notionally elligible EHQLA and HQLA	Fair value of unencumbered assets	ow notionally elligible EHQLA and HQLA
Assets of the reporting institution	**8,339**				**48,238**	**2,056**		
Equity instruments	17				42			
Debt securities	78		78		1,756	952	1,756	952
ow: covered bonds								
ow: asset-backed securities								
ow: issued by general governments	*2*		*2*		*921*	775	*921*	*775*
ow: issued by financial corporations	*24*		*24*		*967*	70	*967*	*70*
ow: issued by non-financial corporations	*52*		*52*		*60*		*60*	
Other assets	8,240				45,433	1,186		

IX-3 AE2 - Collateral received

In millions of euros	FV of encumbered collateral received or own debt securities issued	ow notionally elligible EHQLA and HQLA	FV of collateral received or own debt securities issued available for	ow notionally elligible EHQLA and HQLA
Collateral received by the reporting institution			**1,001**	
Loans on demand			880	
Equity instruments				
Debt securities				
ow: covered bonds				
ow: asset-backed securities				
ow: issued by general governments				
ow: issued by financial corporations				
ow: issued by non-financial corporations				
Loans and advances other than loans on demand				
Other assets			110	
Own debt securities issued other than own covered bonds or ABSs				
Own covered bonds and asset-backed securities issued and not yet pledged			**2,837**	
Total assets, collateral received and own debt securities issued	**8,339**			

Collateral received reported as “on demand” as the guarantee can be activated immediately after default.

IX-4 AE3 - Encumbered assets/collateral received and associated liabilities

In millions of euros	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered
Carrying amount of selected financial liabilities	**5 845**	**8 242**
Derivatives	90	73
Deposits	2 453	3 264
Debt securities issued	3 302	4 906
Other sources of encumbrance		

X - OPERATIONAL AND NON-COMPLIANCE RISKS

1 - OPERATIONAL AND NON-COMPLIANCE RISK MANAGEMENT

RCI Banque is exposed to risks of loss ensuing either from external events or from inadequacies and shortcomings in its internal processes, staff or systems. The operational risk to which RCI Banque is exposed includes among other things the risks relating to events that are very unlikely to occur but that have a high impact, such as the risk of business interruption due to the unavailability of premises, staff or information systems.

The operational risk management system covers all of the RCI Banque group's macro-processes and includes the following tools:

- The mapping of operational management rules rolled out in all consolidated subsidiaries of RCI Banque group. This mapping is regularly updated by the business line divisions, assessed annually by the process owners, and subject to first and second level controls;
- The incident collection database helps to identify malfunctions that correspond to predefined criteria and enables the corrective and preventive measures required to control risks to be put in place. This database is used for internal and regulatory reporting purposes. The system sets thresholds for immediate communication of incidents to the Executive Committee, the Board of Directors, the French Prudential Supervision and Resolution Authority (*ACPR*) and the European Central Bank.
- Key risk indicators (alert thresholds and limits) used to anticipate the occurrence of certain main operational risks. These indicators are defined for "Business and Consumer Customer", "Dealer lending", "refinancing", "accounting" and "IT" processes.

The main operational risks concern business interruption, potential losses or damage related to IT systems - technological infrastructure or use of a technology - internal and external fraud, failure to protect personal data, damage to reputation, inadequate human resources, mismanagement of pension schemes, as well as non-compliance with legislation, regulations and standards in matters of law, tax, accounting, anti-money laundering and combating the financing of terrorism, capital requirements (CRD IV / CRR), bank recovery and resolution (BRRD) and securities issues (bonds, securitization).

Six risk families are given below: legal and contractual risks, tax risks, money laundering and terrorism financing related risks, IT risks, personal data protection related risks and reputational risks.

LEGAL AND CONTRACTUAL RISKS

Risk factors

The RCI Banque group's activity can be affected by any changes in legislation impacting on the marketing of credit and insurance at the point of sale, as well as by any changes in regulatory requirements governing banking and insurance. Additionally, misinterpretation of the law or any inappropriate behavior by staff or agents could also influence RCI Banque group's business.

Management principles and processes

RCI Banque carries out legal analyses of new products marketed and regularly monitors the regulations governing it to ensure it complies with them. The Group has also implemented an internal control system designed in particular to ensure the compliance of transactions made by staff and agents.

TAX RISKS

Risk factors

Through its international exposure, the RCI Banque group is subject to numerous sets of national tax laws, all of which are liable to amendments and uncertainties in interpretation that might affect its operations, financial position and earnings.

Management principles and processes

RCI Banque has put in place a monitoring system designed to list and address all tax issues affecting it.

Any tax disputes with which RCI Banque may be faced as a result of tax inspections are closely monitored and where appropriate, provisions are booked to cover the estimated risk.

RISKS RELATING TO MONEY LAUNDERING AND FINANCING TERRORISM

Risk factors

RCI Banque is subject to international, European and French regulations as regards combating money laundering and financing terrorism. This regulation can expose to penalties, both criminal and disciplinary.

Management principles and systems

RCI Banque has implemented a Group policy set out in a general procedure and Corporate business procedures which are transposed in Group entities. A compliance performance indicator is also assigned to all entities of which RCI has effective control.

IT RISKS

Risk factors

The RCI Banque group's activity is partly dependent on the serviceability of its IT systems. RCI Banque's IT Division, through their governance, security policy, technical architectures and processes, play a part in the fight against threats (cybercrime, frauds …) in order to reduce IT-related risks (systems shutdown, data loss etc.).

Management principles and processes

Oversight of RCI IS risks takes into account good management of and control over potential major IS risks: governance, business continuity, IT security, change and operations management, data integrity and data processing.

These risks are managed and controlled by:

- the incorporation of IT risk management in the overall management system and management of RCI risks at all levels in the company, in accordance with best practices, European Banking Authority guidelines and under European Central Bank supervision;
- the degree of protection of the IT system across the Group;
- everyday control, oversight and management of the Group's "Information Management Policy";
- security awareness and training actions for all personnel (e-learning, information, etc.);
- actions, support and checks performed by the RCI IT Risk, Standards, Compliance and Security Department, which are based on a network of IT Security Officers in every DSI subsidiary, and also on a network of internal auditors;
- a Group IT security policy, incorporating the regulatory requirements (banking, GDPR / personal data, etc.), an overall management approach and ongoing adapting of IT security;
- a policy of the most demanding intrusion and surveillance tests, covering both external risks (examples: websites, mobile applications) and internal risks;
- a Disaster Recovery Plan in place and regular tests of the plan, including the issue of cyber-risks;
- a device and the animation of method correspondents, business lines and IT managers, rolled-out throughout the Group;
- a Group process for managing and registering outsourced services, including the various dimensions related to this risk (governance, security, etc.).

Focus on IT security

RCI Banque implements the Renault Group IS Security policy, also factoring in banking requirements, and placing particular emphasis on access control for its applications, protection of personal and sensitive data and business continuity.
As part of the RCI Banque group's emergency and business continuity plan, IS business resumption plans are operational for all of its deployed and local applications. They are tested at least once a year.

These plans are part of the RCI crisis management process, which ensures coordination with the various business lines (including IS), subsidiaries and branches, RCI partners and regulators (ACPR/ECB, CNIL, etc.).

Users of the information system are contractually bound to observe the rules of use of the IT tool. RCI Banque ensures it preserves the same level of protection when developing new lines of business (electric vehicles, deployment in new territories…).

Hosting the best part of the IT operations of the Group in the "**C2**" **(**main) data center and the "C3" (backup**)** data center enables to guarantee the highest level of protection and uptime for our systems and applications.

Security requirements and controls are managed on both internal and outsourced information systems, starting with calls for tenders and contracts for outsourced services (for all services and all subsidiaries/branches).

PERSONAL DATA PROTECTION RELATED RISKS

Risk factors

The EU General Data Protection Regulation (GDPR) which came into effect on 25 May 2018 apples to RCI Banque. Non-compliance could have serious effects in its business and reputation.

Management principles and systems

As from September 2017, RCI Banque decided to appoint a Data Protection Officer (DPO), in order to implement all measures necessary to comply with the GDPR, to ensure that customers' data is protected, and also that of staff throughout the whole Group.

Risks relating to personal data protection are managed in particular by the implementation of a personal data processing policy, monitoring all data processing as from the design stage, the implementation of appropriate organizational and technical resources and regularly making the company's staff aware of the issue.

REPUTATIONAL RISKS

Risk factors

RCI Banque is exposed to a risk of worsening perception by its customers, counterparties, investors or supervisors, which could adversely affect the group.

Management principles and processes

RCI Banque has put in place corporate governance ensuring efficient management of compliance risks. Through the development and analysis of indicators, the monitoring of this risk enables the bank where appropriate to take corrective actions.

2 - MEASUREMENT OF OPERATIONAL RISKS AND MONITORING PROCESS

The internal control, operational risk and compliance committees of entities and of the group convene every quarter and are structured to monitor changes in the mapping, assessments, the different control levels, incidents, key risk indicators and the related action plans.

3 - EXPOSURE TO THE RISK AND CALCULATION OF REQUIREMENTS

Operational risk is treated with the standard method.

The capital requirement calculation is based on restated average net banking income observed over the last 3 years and gross of other operating charges, broken down into two business segments (retail banking and commercial banking), the regulatory coefficients of which are 12% and 15% respectively. The retail banking business line includes loans to individuals and to SMEs that match the definition given in Article 123 of the CRR. The commercial banking business line includes all other RCI Banque activities.

X-1 Operational risk

In Millions of euros	**Commercial Banking**	**Retail Banking**	**Total**
3 years average NBI - other operating expenses excluded	1 150	1 132	2 282
Value at risk in standardized method	2 156	1 698	3 854
Own funds requirements	**172**	**136**	**308**

X-2 OR2 Business indicator and subcomponents

In millions of euros	Business indicator / subcomponent		
	31/12/2019	31/12/2018	31/12/2017
Interest	**1 465**	**1 404**	**1 235**
Of which Interest income	*2 240*	*2 142*	*2 033*
Of which Interest expense	*-780*	*-743*	*-803*
Of which Dividend income	*6*	*4*	*5*
Services	**462**	**423**	**281**
Of which Fee income	*745*	*674*	*607*
Of which Fee expense	*-234*	*-212*	*-210*
Of which Other operating income	*523*	*486*	*359*
Of which Other operating expense	*-572*	*-524*	*-475*
Financial	**-28**	**8**	**8**
Of which Net P&L on Trading Book	*-21*	*7*	*-2*
Of which Net P&L on Banking Book	*-8*	*1*	*9*

4 - INSURANCE OF OPERATIONAL RISKS

DAMAGE TO PROPERTY AND BUSINESS INTERRUPTION

The French and British companies of the RCI Banque group are affiliated to the world property/business interruption insurance program taken out by Nissan Motor Co. Ltd and Renault S.A.S.

The risk prevention policy is characterized by:

• Installation of efficient and regularly audited security systems;

• Installation of backups in the event of business interruption, as group production is highly dependent on the serviceability of its computer systems.

RCI Banque aims to include all its subsidiaries in the Group's program to guarantee for each entity the same degree of coverage in terms of damage and business interruption.

THIRD-PARTY LIABILITY

The operational liability (the company's liability for damages caused to a third party while conducting its business, in any place, through the fault of the insured person, the staff, buildings and equipment used for the business) of the French subsidiaries has since January 2010 been covered by the Renault Group world program.

Only third-party liability after delivery and/or errors and omissions liability (damage or loss resulting from mismanagement or non-observance of a contractual obligation vis-à-vis third parties) specific to the RCI Banque group's lines of business is still covered by contracts specific to the RCI Banque group:

- one contract covers the third-party liability after delivery and/or errors and omissions liability of the Diac and Diac Location subsidiaries, more particularly concerning long-term rental and car fleet management services;
- one contract insures the Diac and Diac Location subsidiaries against the financial consequences of any third-party liability they may incur as owner or lessor of motor vehicles and equipment by virtue of the activities covered by this contract, namely lease purchasing,

leasing with purchase option and long-term leasing, on the understanding that this contract is a second Tier insurance policy that is invoked if the lessee's insurance defaults;

- in matters of insurance intermediation (insurance contracts offered as a supplement to financing and rental products), RCI Banque and the Diac and Diac Location subsidiaries are insured with specific Errors & Omission liability contracts together with a financial guarantee in accordance with Articles L.512-6, L.512-7, R.512-14 and A.512-4 of the Insurance Code, regulations resulting from transposing of European Directives on the sale of insurance.

For RCI Banque's foreign subsidiaries and branches, the operational and errors & omissions liability contracts, including Errors & Omission liability of the insurance intermediary, are negotiated with local insurers in accordance with local regulations resulting from the transposition of the European directive of 9 December 2002 for European countries or an equivalent regulation for countries outside the EC. The Insurance and Services department oversees the consistency of the programs with group policies.

Since 1st January 2015, a new global Master program of professional liability insurance for the RCI Banque group has been taken out, supplementing local policies (with the exception of Turkey and Russia).

In respect of this program, the insurer will meet the cost of the financial consequences (civil defense costs) of any claim filed by a third party on the grounds of malpractice committed exclusively within the framework of the insured activities, as described below, implicating the Errors & Omission liability of one or more insured parties (RCI Banque group subsidiaries).

The program covers the following two areas:

- so-called “regulated” activities (those for which Errors & Omission liability insurance is a legal obligation): insurance intermediation activities and, for certain countries, banking operations, defined as an “activity consisting in presenting, offering or helping to conclude insurance contracts, respectively, banking operations or payment services, or carrying out works and providing advice prior to their execution”;
- so-called “unregulated” activities (those for which no Errors & Omission liability insurance is imposed by regulations): activities in the banking, stock market, financial, real estate, insurance and reinsurance industries.

Since January 1st, 2018, Renault SAS has taken out a Cyber Risks insurance policy for itself and on behalf of its subsidiaries.

XI - OTHER RISKS

1 - RESIDUAL VALUES RISK

RISK FACTORS

Residual value is the estimated value of the vehicle when its financing plan ends. Changes on the used vehicle market can entail a risk for the holder of these residual values, who undertakes to buy back the vehicles at the end of their financing plans at a price fixed at the outset. This risk can be assumed by RCI Banque, by the manufacturer or by a third party (in particular the Dealers). In the specific case of the United Kingdom, RCI Banque bears residual values risk on financing contracts with the commitment to take back the vehicle.

Management principles and processes

Changes in the used car market have been monitored in depth in line with the range policy, sales channel mix and manufacturer's price positioning in order to best reduce such risk, in particular in instances where RCI Banque takes back vehicles itself. Prudent provisions are made on the loan portfolio when market values become less than the level of RCI Banque's return commitments, or if specific future risks are identified on the used vehicle market.

XII-1 Breakdown of residual values risk carried by the RCI Banque group

In millions euros	Residual values						Provision for residual values					
	2019	2018	2017	2016	2015	2014	2019	2018	2017	2016	2015	2014
Corporate segment:	**208**	**216**	**263**	**247**	**123**	**28**	**19**	**17**	**26**	**12**	**4**	**1**
France	0	0	0	0	0	0	0	0	0	0	0	0
European Union (excluding France)	205	211	256	237	117	28	19	17	26	12	4	1
Europe excluding European union	-	-	-	-	-	-	-	-	-	-	-	-
Retail segment:	**1,727**	**1,728**	**1,719**	**1,652**	**1,525**	**884**	**40**	**44**	**41**	**24**	**11**	**4**
European Union (excluding France)	1,681	1,679	1,682	1,626	1,501	884	36	40	38	22	8	4
Total risk on residual values	**1,935**	**1,944**	**1,981**	**1,899**	**1,649**	**912**	**59**	**61**	**67**	**36**	**15**	**6**

XII-2 Residual values risk not carried by the RCI Banque group

In millions euros	Residual Values				
	2019	2018	2017	2016	2015
Corporate and Retail segments:					
Commitments received from the Renault Group	4,678	3,998	3,502	2,943	2,344
Commitments received from others (Dealers and Customers)	4,666	3,732	2,954	2,128	1,574
Total risk on residual values	**9,344**	**7,730**	**6,456**	**5,071**	**3,918**

2 - INSURANCE RISK

The main risks for insurance intermediation activity are the risk of a defective partnership not identified, the non-compliance of the products distribution and the inadequacy of the products.

For insurance and reinsurance activities of RCI Group's insurance companies, the main risks are linked to the subscription, the technical balance of the products (claims increase, early redemptions, lack of provisioning …) and the investment policy (liquidity risk, counterparty risk …).

These risks are managed, followed and steered in Solvency II regulatory framework. They are subject to a yearly ORSA report (Own Risk and Solvency Assessment).

The group makes a strict selection of contracts and has underwriting guides.

3 - RISKS RELATING TO COMMERCIAL DEPLOYMENT

The RCI Banque group operates in the personal and businesses car finance and services sector. Consequently, there is a risk of sectorial concentration inherent in the Group's business which is managed by the diversification of brands financed, and products and services deployed.

Additionally, in a changing environment, the RCI Banque group strives to adapt its strategy to new demand and new market trends in line with new mobilities.

RCI Banque conducts business internationally and the geographic choices of the Group's sites are determined in accordance with its growth strategy as well as in support of manufacturers. As a result, RCI Banque can be subject, in all areas in which it operates, to a risk of geographic concentration, local economic and financial instability, and changes in government, social and central bank policies. One or more of these factors can have an unfavorable effect on the Group's future results, as exposure to the risk of geographic concentration is partly mitigated by its presence on various markets.

In a complex economic environment, RCI Banque puts in place systems and procedures that meet statutory and regulatory obligations corresponding to its banking status, and that enable it to comprehensively apprehend all the risks associated with its activities and sites, by strengthening its management and control processes.

4 - RISK RELATING TO SHARES

The RCI Banque group's exposure from shares not held for transactional purposes, represent stocks and shares in commercial entities held but not consolidated, valued at fair value P&L weighted at 100% and entities consolidated by the equity method within the regulatory perimeter weighted at 250%. Exposures were €221M at end December 2019 against €223M at end 2018. The main variations are due to:

- the increase in valuation of the share in entities consolidated by the equity method for €+46M;
- the sale of mobility startups (Flit Technologies - including Yuso, Marcel, RCI Mobility, Class & Co SAS and iCabbi) for €-48M.

CROSS-REFERENCE TABLE

CRD IV	Purpose	Consistency
Article 90	Public disclosure of return on assets	Introduction
CRR	**Purpose**	**Consistency**
Article 431	Scope of disclosure requirements	Introduction
Article 432	Non-material, proprietary or confidential information	Introduction
Article 433	Frequency of disclosure	Introduction
Article 435	Risk management objectives and policies	
1a		Part II-1
1b		Part II-2
1c		Part II-1+3
1d		Part IV-2+7 + V + X-4
1e		Part II-1
1f		Part II-3
2a-d		Part II-2
2e		Part II-1+2+3
Article 436	Scope of application	
a-b		Part III-1
c		Part III-2
d		Part III-1
e		Part III-2
Article 437	Own funds	
1a-e		Part III-3
1f		NA own funds determined on the CRR basis only
Article 438	Capital requirements	
a		Part III-5
b		NA no supervisory requirement
c-d		Part IV-4
e		NA no capital required for market risk
f		Part III-4
Article 439	Exposure to counterparty credit risk	
a-d		Part IV-8
e-f		Part V
g-i		NA credit derivative hedges not used
Article 440	Capital buffers	Part III-2
Article 441	Indicators of global systemic importance	Part III-2
Article 442	Credit risk adjustments	Part IV-1
Article 443	Unencumbered assets	Part IX-4
Article 444	Use of ECAIs	Part IV-6

Article 445	Exposure to market risk	Part VII
Article 446	Operational risk	Part X-3
Article 447	Exposures in equities not included in the trading book	
a-b		Part XI-4
c-e		NA no exchange-traded exposure
Article 448	Exposure to interest rate risk on positions not included in the trading book	Part VIII
Article 449	Exposure to securitization positions	Part VI
Article 450	Remuneration policy	Part II-5
Article 451	Leverage	
1a-c		Part III-6
1d-e		Part III-7
Article 452	Use of the IRB Approach to credit risk	
a		Part IV-5
b. i		Part IV-5 (d-iii)
b. ii		Part IV-5 (a+f)
b. iii		Part IV-7
b. iv		Part IV-5 (g)
c		Part IV-5 (d+e)
d-f		Part IV-5 (c)
g-h		Part IV-5 (e)
i-j		Part IV-5 (d+e)
Article 453	Use of credit risk mitigation techniques	Part IV-7
Article 454	Use of the Advanced Measurement Approaches to operational risk	NA Advanced Measurement Approaches not used
Article 455	Use of Internal Market Risk Models	NA internal models not used
Article 492	Disclosure of own funds	Part III-3

TABLES

IV-1		Performing and non-performing exposures and related provisions
IV-1		Collateral obtained by taking possession and execution processes
IV-1	CR2-A	CR2-A - Changes in the stock of general and specific credit risk adjustments
IV-1	CR2-B	CR2-B - Changes in the stock of defaulted and impaired loans and debt securities
IV-5-c	CR6	CR6 IRB approach – Credit risk exposures by portfolio and PD range
IV-5-d		Segmentation of exposures by the advanced method and average PD by country
IV-5-d		History of default rates per class
IV-5-d		The Consumer PD model for Germany end December 2017
IV-5-d	CR9	CR9 - IRB approach – Backtesting of PD per exposure class
IV-5-e		Segmentation of exposures by the advanced method and average LGD by country
IV-5-g	CR8	CR8 - RWA flow statements of credit risk exposures under the IRB approach
IV-6	CR4	CR4 - Standardized approach – Credit risk exposure and Credit Risk Mitigation (CRM) effects
IV-6	CR5	CR5 - Standardized approach – Exposures by asset classes and risk weights
IV-7	CR7	CR7 - IRB – Effect on RWA of credit derivatives used as CRM techniques
IV-8	CCR1	CCR1 - Analysis of counterparty credit risk (CCR) exposure by approach
IV-8	CCR3	CCR3 – Standard approach – CCR exposures by regulatory portfolio and risk weights
IV-8	CCR5-A	CCR5-A - Impact of netting and collateral held on exposure values
IV-8	CCR5-B	CCR5-B - Composition of collateral for exposures to CCR
IV-8	CCR8	CCR8 - Exposures to CCPs
V	CCR2	CCR2 - Credit valuation adjustment (CVA) capital charge
VIII-4	IRRBB1	IRRBB1 - Quantitative information on changes in economic value of equity and net interest income under each of the prescribed interest rate shock scenarios
IX-4	LIQ1	LIQ1 - Liquidity Coverage Ratio (LCR)
IX-4	AE1	AE1 - Encumbered and unencumbered assets
IX-4	AE2	AE2 - Collateral received
IX-4	AE3	AE3 - Encumbered assets/collateral received and associated liabilities
X-3		Operational risk
X-3	OR2	OR2 Business indicator and subcomponents
XI-1		Breakdown of residual values risk carried by the RCI Banque group
XI-1		Residual values risk not carried by the RCI Banque group