



Rabobank

Pillar 3 – Capital Adequacy and Risk Disclosures

Rabobank Australia Limited
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Quarterly Update as at 31 December 2014

Introduction

Rabobank Australia Limited (“the Bank”) is an Authorised Deposit-taking Institution (“ADI”) subject to regulation by the Australian Prudential Regulation Authority (“APRA”) under the authority of the Banking Act 1959.

In accordance with the Australian Prudential Standard 330 (“APS 330”), financial institutions are required to disclose prudential information. A subset of this information is disclosed quarterly.

Verification of the Disclosure

This Basel III Pillar 3 Disclosure (“the Disclosure”) document is unaudited. However, the Disclosure (being prepared as at 31 December 2014) uses information consistent with the independently reviewed information that is supplied to APRA or is otherwise published, as required under the Australian Prudential Standard 310 (“APS 310”).

Additionally, it has been verified in accordance with Board approved policy, ensuring consistency with the Bank’s Annual Report.

Background of Basel II and Implementation of Basel III

The Basel II Capital Accord principles took effect in Australia from 1 January 2008. The framework comprises of three pillars:

- Pillar 1: Minimum Capital Requirements
- Pillar 2: Supervisory Review Process
- Pillar 3: Market Discipline

In December 2010, the Basel Committee on Banking Supervision (“BCBS”) published a discussion paper on banking reforms. These major reforms are to be phased in from 1 January 2013 to 1 January 2019.

In September 2012, APRA published final standards for the implementation of the Basel III capital reforms in Australia. APRA has adopted a more conservative approach than the minimum standards published by the BCBS and a more accelerated timetable for implementation.

The Bank commenced reporting its regulatory disclosures to APRA under the requirements of Pillar 1 from 1 January 2008 using the Standardised Approach. The Bank also adopted the Basel III measurement of regulatory capital effective from 1 January 2013.

The Bank implemented the Pillar 2 requirements including documentation of its Internal Capital Adequacy Assessment Process (“ICAAP”) with the latest version approved by the local Board in March 2015.

The Chief Executive Officer attests that the Disclosure meets the requirements of APS 310 Audit and Related Arrangements for Prudential Reporting. Disclosure controls and procedures have been designed and implemented to effectively manage prudential reporting risk.

Scope of Application

The Bank is a Level 1 entity for regulatory (APRA) reporting purposes. The Bank is a solo entity, therefore it does not have any subsidiaries (Level 2 entities).

| | |
|----------------|---|
| Level 1 | Level 1 – Standalone basis (“Solo”) |
| Level 2 | Level 2 – The consolidation of the Bank and all its subsidiary entities other than non-consolidated subsidiaries (“Consolidated”) |

Context

The Rabobank Group (“Group”) gained accreditation from the De Nederlandsche Bank (“DNB”), Group’s Home Regulator, to use the Advanced Internal Ratings Based Approach (“AIRB”) for credit risk and the Advanced Measurement Approach (“AMA”) for operational risk from 1 January 2008.

The Rabobank Group gained DNB accreditation to use the AIRB for credit risk from 31 December 2008 for the Bank’s Rural portfolio. The Rural lending portfolio is a significant majority of the Bank’s lending by exposure.

The Bank currently remains on the Standardised Approach for Credit, Market and Operational risk for APRA regulatory reporting.

Nature of Business

The Bank continues to focus on the provision of flexible, competitively priced, secured loans to the rural sector in Australia. The Bank continues to provide internet banking services to retail clients through its RaboDirect division.

There were no significant changes in the state of affairs of the Bank during the financial year.

The following table provides a reconciliation of all regulatory capital elements to the Balance Sheet of the Bank in its audited financial statements.

| REGULATORY CAPITAL RECONCILIATION | | | | |
|---|--|----------------|--------------------------------------|-----------------------------------|
| | Balance sheet per published audited financial statements | Adjustments | Balance sheet under regulatory scope | Reference to Attachment A Table 1 |
| | Dec-14 AUD mln | Dec-14 AUD mln | Dec-14 AUD mln | |
| Assets | | | | |
| Due from other financial institutions (including Cash and cash equivalents) | 367.8 | - | 367.8 | |
| Derivative financial instruments | 17.2 | - | 17.2 | |
| Available-for-sale financial assets | 1,691.4 | - | 1,691.4 | |
| Loans and advances | 13,023.9 | (101.2) | 12,922.7 | |
| <i>of which: eligible collective provision component of GRCL in tier 2 capital</i> | | | (101.2) | (f) |
| Due from related entities | 693.7 | (691.1) | 2.6 | |
| Deferred tax assets | 25.0 | - | 25.0 | |
| <i>of which: arising from temporary differences included in CET1 regulatory Adjustments</i> | | | 24.5 | (d) |
| Property, plant and equipment | - | - | - | |
| Other assets | 57.4 | 0.4 | 57.8 | |
| Total assets | 15,876.4 | (791.9) | 15,084.5 | |
| Liabilities | | | | |
| Due to other financial institutions | - | - | - | |
| Derivative financial instruments | 17.5 | - | 17.5 | |
| Deposits | 11,767.8 | (8.0) | 11,759.8 | |
| Due to related entities | 2,070.0 | (699.6) | 1,370.4 | |
| Subordinated debt | 184.0 | - | 184.0 | |
| <i>of which: directly issued qualifying tier 2 instruments</i> | | | - | |
| <i>of which: directly issued instruments subject to phase out from tier 2</i> | | | 184 | (e) |
| Other liabilities | 79.0 | 16.9 | 95.9 | |
| Deferred tax liabilities | 0.6 | - | 0.6 | |
| Total liabilities | 14,118.9 | (690.7) | 13,428.2 | |
| Net assets | 1,757.5 | (101.2) | 1,656.3 | |
| Equity | | | | |
| Contributed equity | 380.7 | - | 380.7 | |
| <i>of which: amount eligible for CET1</i> | | | 380.7 | (a) |
| Reserves | 102.5 | (101.2) | 1.3 | |
| <i>of which: AFS reserve</i> | | | 1.3 | (c) |
| Retained earnings | 1,274.3 | - | 1,274.3 | |
| <i>of which: included in CET1</i> | | | 1,274.3 | (b) |
| Total equity | 1,757.5 | (101.2) | 1,656.3 | |

Attachment A

The disclosures below are presented using the post 1 January 2018 common disclosure template as, pursuant to APRA guidelines, the Bank is applying, in full, the Basel III regulatory adjustments from 1 January 2013.

| Table 1: Common disclosures – composition of capital | | | |
|--|--|-------------------|---|
| | | Dec-14 AUD mln | Source reference to the regulatory capital reconciliation |
| | Common Equity Tier 1 capital: instruments and reserves | | |
| 1 | Directly issued qualifying ordinary shares (and equivalent for mutually-owned entities) capital | 380.7 | (a) |
| 2 | Retained earnings | 1,274.3 | (b) |
| 3 | Accumulated other comprehensive income (and other reserves) | 1.3 | (c) |
| 4 | Directly issued capital subject to phase out from CET1 (only applicable to mutually-owned companies) | - | |
| 5 | Ordinary share capital issued by subsidiaries and held by third parties (amount allowed in group CET1) | - | |
| 6 | Common Equity Tier 1 capital before regulatory adjustments | 1,656.3 | |
| | Common Equity Tier 1 capital: regulatory adjustments | | |
| 7 | Prudential valuation adjustments | - | |
| 8 | Goodwill (net of related tax liability) | - | |
| 9 | Other intangibles other than mortgage servicing rights (net of related tax liability) | - | |
| 10 | Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability) | - | |
| 11 | Cash-flow hedge reserve | - | |
| 12 | Shortfall of provisions to expected losses | - | |
| 13 | Securitisation gain on sale (as set out in paragraph 562 of Basel II framework) | - | |
| 14 | Gains and losses due to changes in own credit risk on fair valued liabilities | - | |
| 15 | Defined benefit superannuation fund net assets | - | |
| 16 | Investments in own shares (if not already netted off paid-in capital on reported balance sheet) | - | |
| 17 | Reciprocal cross-holdings in common equity | - | |
| 18 | Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the ADI does not own more than 10% of the issued share capital (amount above 10% threshold) | - | |
| 19 | Significant investments in the ordinary shares of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold) | - | |
| 20 | Mortgage service rights (amount above 10% threshold) | - | |
| 21 | Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability) | - | |
| 22 | Amount exceeding the 15% threshold | - | |
| 23 | <i>of which: significant investments in the ordinary shares of financial entities</i> | - | |
| 24 | <i>of which: mortgage servicing rights</i> | - | |
| 25 | <i>of which: deferred tax assets arising from temporary differences</i> | - | |

Table 1: Common disclosures – composition of capital (continued)

| | | Dec-14 AUD mln | Source in regulatory capital reconciliation |
|-----------|--|-------------------|--|
| | Common Equity Tier 1 Capital: instruments and reserves | | |
| 26 | National specific regulatory adjustments (sum of rows 26a, 26b, 26c, 26d, 26e, 26f, 26g, 26h, 26i and 26j) | 24.5 | (d) |
| 26a | <i>of which: treasury shares</i> | - | |
| 26b | <i>of which: offset to dividends declared under a dividend reinvestment plan (DRP), to the extent that the dividends are used to purchase new ordinary shares issued by the ADI</i> | - | |
| 26c | <i>of which: deferred fee income</i> | - | |
| 26d | <i>of which: equity investments in financial institutions not reported in rows 18, 19 and 23</i> | - | |
| 26e | <i>of which: deferred tax assets not reported in rows 10, 21 and 25</i> | 24.5 | (d) |
| 26f | <i>of which: capitalised expenses</i> | - | |
| 26g | <i>of which: investments in commercial (non-financial) entities that are deducted under APRA prudential requirements</i> | - | |
| 26h | <i>of which: covered bonds in excess of asset cover in pools</i> | - | |
| 26i | <i>of which: undercapitalisation of a non-consolidated subsidiary</i> | - | |
| 26j | <i>of which: other national specific regulatory adjustments not reported in rows 26a to 26i</i> | - | |
| 27 | Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions | - | |
| 28 | Total regulatory adjustments to Common Equity Tier 1 | 24.5 | |
| 29 | Common Equity Tier 1 Capital (CET1) | 1,631.8 | |
| | Additional Tier 1 Capital: instruments | | |
| 30 | Directly issued qualifying Additional Tier 1 instruments | - | |
| 31 | <i>of which: classified as equity under applicable accounting standards</i> | - | |
| 32 | <i>of which: classified as liabilities under applicable accounting standards</i> | - | |
| 33 | Directly issued capital instruments subject to phase out from Additional Tier 1 | - | |
| 34 | Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1) | - | |
| 35 | <i>of which: instruments issued by subsidiaries subject to phase out</i> | - | |
| 36 | Additional Tier 1 Capital before regulatory adjustments | - | |
| | Additional Tier 1 Capital: regulatory adjustments | | |
| 37 | Investments in own Additional Tier 1 instruments | - | |
| 38 | Reciprocal cross-holdings in Additional Tier 1 instruments | - | |
| 39 | Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the ADI does not own more than 10% of the issued share capital (amount above 10% threshold) | - | |
| 40 | Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions) | - | |
| 41 | National specific regulatory adjustments (sum of rows 41a, 41b and 41c) | - | |
| 41a | <i>of which: holdings of capital instruments in group members by other group members on behalf of third parties</i> | - | |

Table 1: Common disclosures – composition of capital (continued)

| | | Dec-14 AUD mln | Source in regulatory capital reconciliation |
|-----|---|-------------------|--|
| 41b | <i>of which: investments in the capital of financial institutions that are outside the scope of regulatory consolidations not reported in rows 39 and 40</i> | - | |
| 41c | <i>of which: other national specific regulatory adjustments not reported in rows 41a and 41b</i> | - | |
| 42 | Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions | - | |
| 43 | Total regulatory adjustments to Additional Tier 1 capital | - | |
| 44 | Additional Tier 1 Capital (AT1) | - | |
| 45 | Tier 1 Capital (T1=CET1+AT1) | 1,631.8 | |
| | Tier 2 Capital: instruments and provisions | | |
| 46 | Directly issued qualifying Tier 2 instruments | - | |
| 47 | Directly issued capital instruments subject to phase out from Tier 2 | 184 | (e) |
| 48 | Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group T2) | - | |
| 49 | <i>of which: instruments issued by subsidiaries subject to phase out</i> | - | |
| 50 | Provisions | 101.2 | (f) |
| 51 | Tier 2 Capital before regulatory adjustments | 285.2 | |
| | Tier 2 Capital: regulatory adjustments | | |
| 52 | Investments in own Tier 2 instruments | - | |
| 53 | Reciprocal cross-holdings in Tier 2 instruments | - | |
| 54 | Investments in the Tier 2 capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the ADI does not own more than 10% of the issued share capital (amount above 10% threshold) | - | |
| 55 | Significant investments in the Tier 2 capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions | - | |
| 56 | National specific regulatory adjustments (sum of rows 56a, 56b and 56c) | - | |
| 56a | <i>of which: holdings of capital instruments in group members by other group members on behalf of third parties</i> | - | |
| 56b | <i>of which: investments in the capital of financial institutions that are outside the scope of regulatory consolidation not reported in rows 54 and 55</i> | - | |
| 56c | <i>of which: other national specific regulatory adjustments not reported in rows 56a and 56b</i> | - | |
| 57 | Total regulatory adjustments to Tier 2 capital | - | |
| 58 | Tier 2 Capital (T2) | 285.2 | |
| 59 | Total Capital (TC=T1+T2) | 1,917.0 | |
| 60 | Total risk-weighted assets based on APRA standards | 14,282.4 | |
| | Capital ratios and buffers | | |
| 61 | Common Equity Tier 1 (as a percentage of risk-weighted assets) | 11.43% | |
| 62 | Tier 1 (as a percentage of risk-weighted assets) | 11.43% | |
| 63 | Total capital (as a percentage of risk-weighted assets) | 13.42% | |

Table 1: Common disclosures – composition of capital (continued)

| | | Dec-14 AUD mIn | Source in regulatory capital reconciliation |
|----|---|-------------------|--|
| 64 | Buffer requirement (minimum CET1 requirement of 4.5% plus capital conservation buffer of 2.5% plus any countercyclical buffer requirements expressed as a percentage of risk-weighted assets) | 7.0%* | |
| 65 | <i>of which: capital conservation buffer requirement</i> | 2.5%* | |
| 66 | <i>of which: ADI-specific countercyclical buffer requirements</i> | - | |
| 67 | <i>of which: G-SIB buffer requirement (not applicable)</i> | - | |
| 68 | Common Equity Tier 1 available to meet buffers (as a percentage of risk-weighted assets) | 4.43%* | |
| | National minima (if different from Basel III) | | |
| 69 | National Common Equity Tier 1 minimum ratio (if different from Basel III minimum) | n/a | |
| 70 | National Tier 1 minimum ratio (if different from Basel III minimum) | n/a | |
| 71 | National total capital minimum ratio (if different from Basel III minimum) | n/a | |
| | Amount below thresholds for deductions (not risk-weighted) | | |
| 72 | Non-significant investments in the capital of other financial entities | - | |
| 73 | Significant investments in the ordinary shares of financial entities | - | |
| 74 | Mortgage servicing rights (net of related tax liability) | - | |
| 75 | Deferred tax assets arising from temporary differences (net of related tax liability) | 24.5 | (d) |
| | Applicable caps on the inclusion of provisions in Tier 2 | | |
| 76 | Provisions eligible for inclusion in Tier 2 in respect of exposures subject to standardised approach (prior to application of cap) | 101.2 | (f) |
| 77 | Cap on inclusion of provisions in Tier 2 under standardised approach | n/a | |
| 78 | Provisions eligible for inclusion in Tier 2 in respect of exposures subject to internal ratings-based approach (prior to application of cap) | n/a | |
| 79 | Cap for inclusion of provisions in Tier 2 under internal ratings-based approach | n/a | |
| | Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2018 and 1 Jan 2022) | | |
| 80 | <i>Current cap on CET1 instruments subject to phase out arrangements</i> | - | |
| 81 | <i>Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)</i> | - | |
| 82 | <i>Current cap on AT1 instruments subject to phase out arrangements</i> | - | |
| 83 | <i>Amount excluded from AT1 instruments due to cap (excess over cap after redemptions and maturities)</i> | - | |
| 84 | <i>Current cap on T2 instruments subject to phase out arrangements</i> | 184.0 | (e) |
| 85 | <i>Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)</i> | - | |

*The capital conservation buffer comes into effect from 1 January 2016.

Attachment C

| Table 3: Capital Adequacy (Risk Weighted Equivalent) | | |
|---|------------------|-------------------|
| | 31 December 2014 | 30 September 2014 |
| | AUD mln | AUD mln |
| Credit Risk subject to standardised approach | | |
| Corporate* | 13,145.4 | 13,930.5 |
| Government | - | - |
| Bank | 97.8 | 85.9 |
| Residential Mortgage | 81.6 | 82.1 |
| Other Retail | - | - |
| Other | - | - |
| Total capital requirement subject to standardised approach | 13,324.8 | 14,098.5 |
| Credit risk capital requirement relating to securitisation exposures | - | - |
| Market risk minimum capital requirement | 3.3 | 2.9 |
| Operational risk minimum capital requirement | 954.3 | 922.1 |
| Total RWA and capital requirement | 14,282.4 | 15,023.5 |
| Capital Ratios (%) | | |
| Common Equity Tier 1 Capital Ratio | 11.43% | 10.56% |
| Tier 1 Capital Ratio | 11.43% | 10.56% |
| Total Capital Ratio | 13.42% | 12.46% |

* Note: Corporate includes corporate and private sector counterparties.

Attachment C

| Table 4: Credit Risk | | | | |
|---|----------------------------------|--|----------------------------------|--|
| Exposure Type | 31 December 2014 | | 30 September 2014 | |
| | Gross credit exposure AUD mln | Average gross credit exposure AUD mln | Gross credit exposure AUD mln | Average gross credit exposure AUD mln |
| Cash and liquid assets | 367.8 | 362.9 | 358.0 | 429.2 |
| Trading securities | - | - | - | - |
| Investment securities | 1,703.1 | 1,684.9 | 1,666.6 | 1,599.7 |
| Due from other financial institutions | 691.1 | 648.9 | 606.8 | 646.4 |
| Loans and advances | 13,084.0 | 13,473.3 | 13,862.5 | 13,957.5 |
| Acceptances | - | - | - | - |
| Derivatives* | 62.3 | 71.9 | 81.4 | 72.1 |
| Contingent liabilities, commitments, and other off-balance sheet exposures* | 92.3 | 92.2 | 92.1 | 78.4 |
| Other assets | - | - | - | - |
| Total exposures | 16,000.6 | 16,334.1 | 16,667.4 | 16,783.3 |
| | | | | |
| Portfolios subject to standardised approach | Gross credit exposure AUD mln | Average gross credit exposure AUD mln | Gross credit exposure AUD mln | Average gross credit exposure AUD mln |
| Corporate** | 13,010.4 | 13,395.5 | 13,780.7 | 13,864.6 |
| Government | 1,623.9 | 1,824.3 | 2,024.6 | 2,028.9 |
| Bank | 1,168.1 | 915.3 | 662.4 | 690.2 |
| Residential Mortgage | 198.2 | 199.0 | 199.7 | 199.6 |
| Other retail | - | - | - | - |
| Other | - | - | - | - |
| Total exposures | 16,000.6 | 16,334.1 | 16,667.4 | 16,783.3 |

* Note: Derivatives and off-balance sheet exposures represent the credit equivalent amount of the Bank's off-balance sheet exposures calculated in accordance with APS112.

** Note: Corporate includes corporate and private sector counterparties.

Attachment C

Table 4: Credit risk (continued)

| Portfolios subject to standardised approach as at 31 December 2014 | Impaired loans AUD mln | Past due loans >= 90 days** AUD mln | Specific provision balance AUD mln | Charges for specific provision AUD mln | Write-offs AUD mln |
|---|----------------------------------|--|--|--|------------------------------|
| Corporate* | 280.8 | 398.7 | 77.8 | 11.2 | 70.3 |
| Government | - | - | - | - | - |
| Bank | - | - | - | - | - |
| Residential Mortgage | - | - | - | - | - |
| Other retail | - | - | - | - | - |
| Other | - | - | - | - | - |
| Total | 280.8 | 398.7 | 77.8 | 11.2 | 70.3 |

| Portfolios subject to standardised approach as at 30 September 2014 | Impaired loans AUD mln | Past due loans >= 90 days** AUD mln | Specific provision balance AUD mln | Charges for specific provision AUD mln | Write-offs AUD mln |
|--|----------------------------------|--|--|--|------------------------------|
| Corporate* | 309.3 | 526.6 | 137.6 | 3.0 | 4.4 |
| Government | - | - | - | - | - |
| Bank | - | - | - | - | - |
| Residential Mortgage | - | - | - | - | - |
| Other retail | - | - | - | - | - |
| Other | - | - | - | - | - |
| Total | 309.3 | 526.6 | 137.6 | 3.0 | 4.4 |

| Balance | 31 December 2014 AUD mln | 30 September 2014 AUD mln |
|-----------------------------------|------------------------------------|-------------------------------------|
| General reserve for credit losses | 101.2 | 101.2 |

* Note: Corporate includes corporate and private sector counterparties.

** Note: Past due loans >= 90 days includes impaired loans.

Attachment C

No securitisation or resecuritisation activity was undertaken during the September 2014 or December 2014 quarters.

| Table 5: Securitisation Exposures | | | | |
|---|-----------------------------|-----------------------------------|-----------------------------|-----------------------------------|
| Table 5: Securitisation Exposures – Underlying asset type | 31 December 2014 | | 30 September 2014 | |
| | Total Exposures Securitised | Recognised Gain or (Loss) on sale | Total Exposures Securitised | Recognised Gain or (Loss) on sale |
| | AUD mln | AUD mln | AUD mln | AUD mln |
| Housing loans | - | - | - | - |
| Commercial loans | - | - | - | - |
| Credit Cards and other Personal Loans | - | - | - | - |
| Auto and Equipment Finance | - | - | - | - |
| Other | - | - | - | - |
| Total | - | - | - | - |

| Securitisation Exposure – Securitisation facility type | 31 December 2014 | | | 30 September 2014 | | |
|--|--|---|---|--|---|---|
| | On-Balance Sheet Securitisation Retained | On-Balance Sheet Securitisation Purchased | Off-Balance Sheet Securitisation Exposure | On-Balance Sheet Securitisation Retained | On-Balance Sheet Securitisation Purchased | Off-Balance Sheet Securitisation Exposure |
| | AUD mln | AUD mln | AUD mln | AUD mln | AUD mln | AUD mln |
| Securities | - | - | - | - | - | - |
| Liquidity support facilities | - | - | - | - | - | - |
| Funding facilities | - | - | - | - | - | - |
| Warehouse facilities | - | - | - | - | - | - |
| Lending facilities | - | - | - | - | - | - |
| Other commitments and credit enhancements | - | - | - | - | - | - |
| Derivative transactions | - | - | - | - | - | - |
| Underwriting facilities | - | - | - | - | - | - |
| Other | - | - | - | - | - | - |
| Total | - | - | - | - | - | - |



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