

Market Discipline

2013

June 30, 2014



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Foreword

This document uses regulatory reporting information in order to comply with the Bank of Portugal's Notice 10/2007, regarding public disclosure of information, which states that the information provided should adequately cover the risks incurred, taking into account strategic goals and the processes and assessment systems in place. All analyses are based on year-end 2013 data.

1. Declaration of Responsibility

With regards to the information presented in the document "Market Discipline", the board of directors of Caixa Económica Montepio Geral (CEMG) certifies:

- That all procedures deemed necessary were carried out and that, to the best of its knowledge, all information disclosed is true and accurate;
- The quality of all information disclosed;
- That any significant changes occurring during or after the preparation of this document will be promptly disclosed.

2. Scope and risk management policies

2.1 Scope

This report pertains to the consolidated accounts of the group, from a regulatory perspective, which includes Caixa Económica Montepio Geral (CEMG); Banco Montepio Geral Cabo Verde - Sociedade Unipessoal, S.A. (IFI); Montepio Investimento, SA¹; Montepio Crédito; Montepio Valor – Sociedade Gestora de Fundos Mobiliários, SA² and Finibanco Angola, SA.

2.2 Risk management strategies, processes, structure and organization

Risk analysis and control at CEMG are the responsibility of the Risk Division (Direção de Risco - DRI), which advises the board of directors on subjects pertaining to risk management. The implementation of risk management and control mechanisms is, in general, the responsibility of the areas where the risks in question arise.

As recommended by the Basel Committee, the DRI reports directly to the board of directors and is independent from the departments responsible for commercial decision-making. Additionally, and also independently, the Internal Audit and Inspection Division analyses the adequacy of processes and their implementation, from the standpoint of internal and external rules.

DRI encompasses three departments:

 (i) Risk Modeling Department - responsible for developing internal credit risk analysis models and incorporating them in decision-making processes, and also for internal reports on credit risk;

¹ Previously designated by Finibanco, SA.

² Previously designated by Finivalor – Sociedade Gestora de Fundos Mobiliários, SA.



- (ii) Global Risks Department performs analysis and regulatory and internal reporting on liquidity, market, interest rate and solvency risks, as well as the respective integration of that information into the decision-making processes;
- (iii) Business Risks Department responsible for the definition of policies related to analysis and origination of credit and for the operationalization of the operational risk management and quantification system and of the business continuity management cycle.

CEMG is exposed to a set of risks, namely credit, concentration, market, interest rate, liquidity, real estate and operational risks. All the risks identified as substantial are subject to a regular control process and to risk mitigation actions, aiming at reducing the potential losses to the CEMG group. The monitoring of those risks is concentrated in DRI, which integrates the positions and interests of the board of directors.

Following the publication on the 26th of june 2013 of the European regulation on the new prudential framework for the banking sector, known as Basel III, with new rules and capital requirements, defined by the Capital Requirements Directive IV (Directive 2013/36/EU) and by the Capital Requirements Regulation (Regulation 575/2013) (CRD IV/CRR), CEMG has been adopting risks monitoring and controlling according to the regulatory changes introduced and the analyses referred in this document do not alter meaningfully with the introduction of the new regulation.

The main principle of **credit risk** analysis is independence from commercial decision-making, with direct reporting to the board of directors. In this analysis, different tools are used, and rules defined, according to the size of the exposure, the degree of familiarity with the type of risk in question (e.g. the capacity to model those risks) and the liquidity of the instruments in question.

The analysis of loans is based on the mandatory use of risk assessment models, developed inhouse in accordance with the requirements of the Basel Committee.

Thus, in operations with individuals (typically smaller amounts), specific scoring models are used for the main credit portfolios (i.e. mortgages, personal loans and credit cards).

In the Small-Business segment, a scoring model is used to evaluate not only the creditworthiness of the business, but also of its promoters.

In the Corporate segment, customers are classified according to an internal rating model that includes four components:

- (i) quantitative (economic and financial information);
- (ii) qualitative (management quality and reputation);
- (iii) sector-oriented;
- (iv) behavioral (banking relationship).

The degree of scrutiny in credit risk analysis depends on the scale of the operations concerned. Limits have been defined, based on the amount of the operation, risk classification and total exposure, to identify when it is necessary for a report to be drawn up by credit analysts, who are independent from the commercial decision-making process.

These reports include the limits to exposure defined for the loan maturity, taking into account the client's capacity to generate cash flows and its financing costs.

CEMG's risk management strategies also take into account the capital requirements associated with its operations, via rules for decision-making and the pricing of credit.



The pricing of loans reflects the corresponding expected loss, along with the cost of borrowed capital and of own funds, as well as administrative costs. In quantifying the expected loss, the marginal probability of default for the loan maturity and the internal risk class is taken into consideration, as is the severity of the loss, quantified by market estimates, taking into account the type of credit and collateral. Pricing also reflects the strength of the commercial relationship with customers.

Overriding the response of scoring systems, internal ratings and internal pricing tables is allowed, though only with hierarchical approval, in accordance with principles of delegation established. Rejection criteria are defined to minimize the risk of adverse selection, meaning there is always at least one rejection class.

Thus, credit rejections are determined by the existence of credit events in the financial system, the breach of credit rules (e.g. borrowing capacity) and whenever the level of risk-adjusted pricing significantly increases adverse selection risk.

Thresholds for participation are also defined for the different decision-making levels, based on the size of the operation and overall customer exposure, type of operation/collateral and pricing/ ROE (Return on Equity). In this context, the guiding principle is that the authority to approve operations with a lower risk-adjusted ROE, or larger exposure, lies with the higher levels of management. These thresholds are approved by the board of directors, which is at the top of the decision hierarchy and exercises its authority through the Credit Committee. Participants in this decision-making forum also include the heads of the commercial departments, the Credit Analysis Department and the DRI.

The **concentration risk** is monitored at an individual level and at a business sector level, evidencing eventual diversification deficiencies.

The concentration risk management is performed at an aggregate level, with a regular monitoring by DRI of concentration indices. Besides that control, the levels of regional diversification and corporate portfolio quality diversification are monthly monitored by DRI.

CEMG has established single counterparty exposure limits for financial institutions. Exceptions to the internal limits, even if temporary, require approval from the board of directors.

In the field of **market risk**, Value-at-Risk (VaR) and stress testing using extreme scenarios are fundamental for analyzing and imposing limits on exposure. Financial activity is monitored through weekly reports on asset portfolios and also counterparty risk reports. Stop-loss and exposure limits are also defined (for each asset class, portfolio, counterparty, rating level and time period). There are also limits for products which require more complex analysis and for currency exposures.

These reports include monitoring of the different exposure limits and analysis of concentration, credit, interest rate and price-variation risk, among others. These analyses take into account scenario analysis, namely the sensitivity of securities portfolio to changes in interest rates, spreads, exchange rates and share and real estate market prices.

In addition to CEMG's exposures, DRI monitors market risks from Montepio Investimento (MI) portfolio, through daily exposure reports and weekly control of CEMG's combined exposure limits.



In terms of liquidity and interest rate risks:

- Static and dynamic 12-month gaps are regularly calculated, with monthly (in the case of liquidity) and bi-annual (in the case of interest rate risk) reports submitted to the Bank of Portugal. In this context, CEMG also performs simulations of potential adverse events.
- The liquidity position and its evolution are internally monitored on a daily basis and on a monthly basis by the ALCO Committee, where the medium and long term risks are also addressed. In addition to mismatches, the concentration of funding, principal repayments of liabilities expected, and existing and prospect funding sources are also analyzed.
- An analysis of interest rate risk, balance sheet characterization and a sensitivity analysis of the net interest income and earnings of various risk factors are also studied on a monthly basis by this committee.

The **real estate risk** arises from the exposures in properties that are received through credit recovery processes and is monitored regularly by the institution. An accurate independent revaluation of the properties is performed with a maximum time interval of 3 years and the risk of extreme events are controlled though stress tests exercises (sensitivity and scenario analyses). The scenario analysis takes into consideration extreme losses based on hypothetical price scenarios for property investment funds, investment properties and properties received as a recovery of non-performing loans.

The **operational risk** management system is based on identifying, assessing, monitoring, measuring, mitigating and reporting risks of this type. In terms of CEMG's organizational structure, there is a unit dedicated to operational risk management, complemented by operational risk partners in the different companies and business units of the group.

During 2013, following the implementation of the new IT support tool, the operational risk management system applied within Montepio has been expanded to the other group entities. Montepio Crédito has already in place the calculation of capital requirements using the standardized approach, which will be applied at a later stage to Finibanco Angola and Montepio Investimento.

Bearing in mind the strengthening of the operational risk culture, several e-learning training actions were held for the employees at the commercial network and at the Group's entities, namely Montepio Valor, Futuro, Montepio Crédito and Montepio Gestão de Ativos.

The evaluation of the operational risk profile of new products, processes and activities and subsequent follow-up have allowed the earlier identification and mitigation of operational risk situations.

Regarding the risk monitoring, the main activities included the process of loss event capture and analysis, Key Risk Indicators (KRI) analysis, evaluating the Operational Risk exposure at a Committee and developing periodic reports on the institution's operational risk profile.

Within the "mitigating" phase, Action Plans were suggested for the most significant risks identified by the operational risk tools mentioned above.

The **business continuity plan** is supported for a set of evaluation activities, design, implementation and monitoring, integrated into a continuous improvement cycle. This process is critical to risk mitigation, making business processes more resilient, ensuring the continuity of operations in case of a disruptive event.



The critical business processes and respective Recovery Time Objective (RTO) were reviewed, new recovery systems solutions implemented and recovery business exercises performed.

Internal committees focusing on risk management issues also meet regularly, namely the Risk Committee and ALCO (monthly), where DRI plays an active role and is responsible for the presentation of the relevant risk indicators and information.

In addition, DRI is part of the Investment Committee of Futuro (in charge of Montepio's Pension Fund management) and the Monitoring Committee of Montepio's Pension Fund.

2.3 Scope and nature of risk measurement and information systems

The risk analysis procedures at CEMG include regular reports on the main types of risk to the board of directors and the business areas involved. Regarding **credit risk**, monthly internal reports are produced, with information broken down by commercial department, the main credit portfolio risk indicators and metrics on the use of risk models. The major credit exposures, evolution trends for credit portfolio quality, non-performing loans ratios and a watchlist summarizing exposures that deserve closer supervision and action are identified monthly at the Risk Committee. A weekly report on exposures to counterparty risk is also produced.

The **concentration risk** is followed monthly through reports that are produced by DRI, which reflect the regional diversification level and the corporate portfolio quality.

In the area of **market risk**, in addition to a weekly risk report on CEMG and Montepio Investimento's total portfolio, reports are prepared on a weekly basis for the trading book, as well as for the proprietary portfolio of available for sale assets and a monthly report on the pension fund portfolio. These reports contain information on market risk (e.g. Value-at-Risk), credit risk (external ratings and *Credit*VaR), compliance with limits on exposure and risk, stop-loss and portfolio composition by rating, country, type of security and issuer. DRI also produces daily reports with the details of the daily bond trades done by CEMG and Montepio Investimento and with the portfolio individually managed by Montepio Investimento, including exposures to other counterparties that consolidate with CEMG.

Regarding the **liquidity and interest rate risks**, the monthly report of balance sheet risks monitors those risks' evolution, complementing that control with diverse analyses on the characteristics of the balance sheet.

The **real estate risk** is followed monthly and quarterly stress tests are performed in order to measure the impact of changes in the real estate market on property investment funds, investment properties and properties received as a recovery of non-performing loans.

At the **operational risk** level, a quarterly report concerning the loss data collection is prepared and, additionally, an annual report regarding the Operational Risk Management Cycle implemented at CEMG is issued.

Risk control techniques and models are based on econometric modeling using CEMG's own experience in granting different types of credit and also, wherever possible, in terms of recovery.



Thus, internal rating models are used for the corporate segment and application scoring models are used for loans to individuals and small businesses. The models used for corporate and small business clients distinguishes between the construction sector and other economic sectors, while in loans to individuals specific models are used for each of the main credit portfolios — mortgage loans, personal loans and credit cards — and a distinction is made between individuals who have been customers of CEMG for more than a year and others.

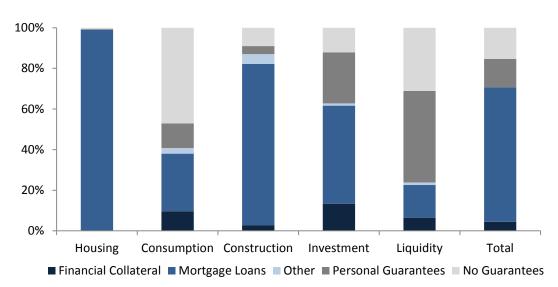
Internal rating models classify companies into 7 "performing" risk classes and a final class which corresponds to default³.

The reactive scoring models use a scale that integrates 8 classes in case of mortgage loans and 10 classes in case of personal loans, aggregating in both cases pre-existing and new customers. The credit card scoring model classifies credit proposals into 4 risk classes.

2.4 Risk coverage and mitigation policies

Collateral requirements depend on the size of the unexpected loss for a given loan and typically apply to operations of greater volume, especially those that involve lending for construction or residential housing purchases. When operations involve real collateral, the loan-to-value ratio is taken into consideration for purposes of pricing, as an indicator of potential loss severity.

Different coverage policies are defined for different types of credit. The distribution by guarantee type for each credit portfolio segment is shown below:





Risk mitigation through collateralization is considered when calculating the price of operations, either via the borrower's credit risk (in the case of real collateral), or through reduction of the

³ This seventh risk class also includes companies that are in default within the Portuguese financial system, despite being type for each credit portfolio segment is shown below: classified as performing on all credits at Montepio.



exposure level, in situations involving financial collateral (where the market risk of the assets involved is taken into account).

As a rule, personal guarantees are required for retail loans whenever the customer does not comply with debt-to-income rules, while in the context of corporate credit they are standard for loans involving larger amounts, for smaller companies, and wherever there is a need to further mitigate risk, in light of the operation's collateralization.

3. Capital adequacy

3.1 Regulatory capital

The regulatory capital for solvency purposes includes core and complementary capital, deducted of the negative components of each.

Core or Tier 1 capital is understood as:

- Institutional capital;
- Participation fund of CEMG;
- Issue premiums on shares and participation securities;
- Legal, statutory and other reserves made up of retained earnings;
- Positive results for the year in progress and previous years, net of provisions, depreciation, tax and expected dividends.

Complementary or Tier 2 capital is understood as:

Upper Tier 2

- Revaluation differences on assets available for sale;
- Revaluation reserves on fixed assets;
- Other authorized reserves;
- Subordinated liabilities with no fixed term to maturity;

Lower Tier 2

- Subordinated loans;
- The released portion of redeemable preference shares;

Negative elements of regulatory capital correspond to:

- Units of the participation fund of CEMG held by the own institution;
- Assets held by the institution that are part of the regulatory capital of a third party;
- Intangible fixed assets;
- Negative results for the year in progress and previous years;
- Total amount of deposits referred to in the Bank of Portugal's Notice 28/2011;
- Negative revaluation reserves.

3.2 Internal capital allocation

CEMG's capital requirements for credit and market risk, as of December 31, 2013, were calculated using the Standardized Approach. Concerning the operational risk, calculations used



the Standardized approach for CEMG, MG Cabo Verde and Montepio Crédito and the Basic Indicator approach for Montepio Investimento and Finibanco Angola. All calculations are in accordance with the regulations of the Bank of Portugal (Notices 5/2007, 8/2007 and 9/2007).

The following table shows the distribution of capital requirements for various types of risk:

Table 1 – Capital Requirements by Risk Type

				(thousands €)
	Credit Risk	Market Risk	Operational Risk	Total
Dec-12	1.021.871	4.201	66.235	1.092.307
Dec-13	1.067.147	3.664	63.169	1.133.980

Within capital requirements for credit and counterparty risk, approximately 94% corresponds to the loan portfolio.

3.3 Capital adequacy

The CEMG Group strives to provide the institution with a level of capital appropriate for the evolution of its business, which will ensure satisfactory solvency indicators, consistent with the regulatory recommendations.

2013 was a remarkable year for CEMG since it was the year when the capital of CEMG was opened to public investment, with the first public subscription offer of the participation fund of Caixa Económica Montepio Geral. The main purpose of OPS was the reinforcement of the institution's base own funds with the subscription of 200 million participation units with a face value of 1 euro each. Additionally, institutional capital was increased in 205 million euros (from 1.295 to 1.500 million euros) by Montepio Geral Associação Mutualista.

These developments led the capital (institutional capital plus participation fund) to amount 1.700 million euros and the core tier 1 ratio to reach 11,00% in December 2013.

At the same time, CEMG has maintained resources in the form of subordinated debt, which are included in the complementary own funds and benefit the total solvency ratio.

In light of the internal strategic plan and of the objectives of the Funding and Capital Plan, under the financial aid program to the Portuguese Republic, no significant changes are anticipated in the material dimensions of the various types of risk. Also, the forecasts and analyses verify that CEMG is adequately capitalized under a base case scenario and under an adverse scenario, even under the new regulatory framework introduced by CRD IV/CRR.

With regards to credit risk, higher levels of collateralization for new retail loans are observed, reducing the average loan-to-values ratios, improving the average levels of capital requirements.

The current strategy of diversification across economic sectors, particularly in the corporate segment, will move in the opposite direction where collateral is concerned. However, though exposure is expected to rise in sectors not related to construction, a greater effort to increase the collateralization of new loans will continue.



The following Tables 2 to 4 provide a summary of solvency figures throughout 2013, taking into account only Pillar I requirements.

Table 2 – Capital adequacy for regulatory capital purposes

		Capital Adamusay Dart 1	(t Dec-13	housands
T ()	1.4	Capital Adequacy - Part 1		Dec-12
		pital for solvency purposes	1.849.276	
1. Core			1.570.508	
1.1.1.	3	•	1.700.000	
		Paid-in share capital		1.295.00
		(-) Own shares	0	
		share issuance premiums	0	
	1.1.1.4.	Other financial instruments similar to capital	0	
1.1.2.	0	erves and results	-108.402	222.3
		Reserves	191.945	224.6
		Eligible minority interests	8.882	5.8
		Results from the previous year and provisional results for the current year	0	8
	1.1.2.4.	(-) Negative results from the previous year and negative provisional results for the current year	-298.626	
	1.1.2.5.	Results from the previous year and provisional results for the current year	0	
	1.1.2.6.	(-) Net gains from capitalisation of future margin income from securitised assets	0	
	1.1.2.7.	Revaluation differences eligible for Tier 1 regulatory capital	-10.603	-9.0
1.1.3.	Fund for ger	neral banking risks	0	
1.1.4.	Other items	eligible for Tier 1 capital	68.066	53.8
	1.1.4.1.	Other eligible instruments	8.273	15.0
	1.1.4.2.	Impact of the transition to the IAS/AAS (negative impact)	1.358	2.8
	1.1.4.3.	Other items eligible for Tier 1 capital	58.435	36.0
1.1.5.	(-) Other iter	ns deductable from Tier 1 capital	-89.156	-106.5
	1.1.5.1.	(-) Intangible fixed assets	-59.279	-69.2
	1.1.5.2.	(-) Amount in excess of the eligibility limit for financial instruments included in Tier 1 capital	0	
	1.1.5.3.	(-) Other items to be deducted from Tier 1 capital	-29.877	-37.2
2. Comp	lementary ca	pital	316.556	440.9
1.2.1.	Upper Tier 2		12.918	10.2
1.2.2.	Lower Tier 2		303.638	430.6
1.2.3.	(-) Deduction	ns from complementary capital	0	
3. (-) De	ductions from	Tier 1 and complementary capital	-22.173	-38.2
. ,		from Tier 1 capital	-11.087	-19.1
1.3.b.	()	from complementary capital	-11.087	-19.1
	()	for solvency purposes	1.559.421	1.445.5
		ary capital for solvency purposes	305.469	421.7
		total regulatory capital	-15.615	-12.9
. ,		ary capital available to cover market risks	0	
	e record:	A set in the set of th	0	
1.8.1		/ (-) Shortfall in value corrections and "provisions" for assets risk weighted via the internal hod	0	
	1.8.1.1	Amount of value corrections and "provisions" in the internal models method	0	
		(-) Expected loss determinded by the internal models method	0	
1.8.2.		ue of subordinated debt recognised as a positive contributor to own funds	0	
1.8.3.		quirement for social capital	0	
1.8.4.		apital for the purpose of large exposures limits	1.849.276	1 854 /



Table 3 – Capital adequacy for capital requirements purposes

			Constal Adamson Part 2	(Dec-13	thousands €)
0	Desidentes		Capital Adequacy - Part 2		Dec-12
2.	0 ,	capital requireme		1.135.092	1.092.307
2.1.			risk, risk of decrease in receivables and delivery risk	1.067.147	1.021.871
	2.1.1.	Standardised		1.067.147	1.021.871
	2.1.1.1.		s in the standardised approach, excluding securitisation positions	1.066.395	1.021.018
		2.1.1.1.1.	Claims and conditional claims on central governments and central banks	1.267	1.129
		2.1.1.1.2.	Claims and conditional claims on regional governments and local authorities	674	744
		2.1.1.1.3.	Claims and conditional claims on public sector and othe non-profit public institutions	296	2.752
		2.1.1.1.4.	Claims and conditional claims on multilateral development banks	0	0
		2.1.1.1.5.	Claims and conditional claims on international organizations	0	0
		2.1.1.1.6.	Claims and conditional claims on insitutions	55.899	44.491
		2.1.1.1.7.	Claims and conditional claims on corporations	427.392	416.918
		2.1.1.1.8.	Claims and conditional claims in the retails portfolio	81.819	93.580
		2.1.1.1.9.	Claims and conditional claims seccured by real estate	265.325	256.561
		2.1.1.1.10.	Past due items	78.026	74.600
		2.1.1.1.11.	Items classified as high risk for regulatory purposes	0	0
		2.1.1.1.12.	Covered bonds and public sector bonds	780	618
		2.1.1.1.13.	Exposures to colective investment undertakings (CIU)	41.843	33.280
		2.1.1.1.14.	Other items	113.075	96.346
	2.1.1.2.	Securitisatio	n exposures using the standardised approach	752	852
	2.1.1.3.	(-) Provisions	s for general credit risks	0	0
2.2	Settlement	risk		0	0
2.3	Capital req	uirements for pos	ition risk, foreign exchange risk and commodities risk	3.664	4.201
	2.3.1.	Standardised	d approach	3.664	4.201
	2.3.1.1.	Debt instrum	nents	2.395	2.076
	2.3.1.2.	Equity instru	iments	1.269	2.125
	2.3.1.3.	Exchange ra	ate risk	0	0
	2.3.1.4.	Commodities	s risk	0	0
2.4	Capital req	uirements for ope	arational risk	64.281	66.235
	2.4.1.	Basic indicat		7.275	6.320
	2.4.2.	Standardised		57.005	59.915
	2.4.3.		easurement methods	0	0
2.5			ents - fixed general expenditure	0	0
			ents or other capital requirements	0	0

Table 4 – Total Capital adequacy

		(thousands €)
Capital Adequacy - Part 3	Dec-13	Dec-12
Surplus (+) / Shortfall (-) in total capital	714.184	762.127
Total Capital Ratio (%)	13,03%	13,58%



4. Counterparty credit risk

4.1 Exposure Limits

Various limits have been defined for the most relevant risks faced in the course of business. In measuring counterparty credit risk, particular attention is paid to large exposure limits, which are based on internal ratings and profit levels.

4.2 Assessment policies of collaterals

Given the credit quality (rating) of counterparties and the limited level of exposure, no guarantees are required for these operations.

4.3 Quantitative information

As illustrated in Table 5, CEMG's counterparty risk exposures are proportionally low compared to the total portfolio (below 10% of total exposure) and mostly associated with central government entities or financial institutions.

		Credit risk mitigation		,	ted exposure	
	Original Exposure	techniques with ginal Exposure substitution effect in the original net exposure		Dec-13	Dec-12	
					5	
Repos, borrowing/lending of securities or commodities, long settlement transactions or transactions with imposition of margin loans	1.657	0	1.657	1.657	3.473	
Derivatives	100.377	0	100.377	62.349	35.711	
Contractual multiproduct netting	0	0	0	0	0	

Table 5 – Counterparty credit risk

The Mark-to-Market valuation method is used to calculate the exposure value for derivatives, repurchase transactions, borrowing or lending of securities or commodities, long term settlement transactions and lending operations with margin imposition, as defined in the Bank of Portugal's Notice 5/2007, Annex V, Part 3. This method consists of adding a potential-future-value adjustment to the market value of the exposure, which is calculated by multiplying the notional value by a regulatory factor defined according to the type of contract and its residual maturity.

As of December 31, 2013, CEMG had no credit risk hedging operations via credit derivatives, as shown in Table 6.

(thousands E)



Table 6 – Credit Derivatives Hedging

							(tl	nousands €)
	Original			Notional a		ed by credit		
Risk Class	exposure		CDS (1)	() TDO (0)		Other	Total	Total
(Hedged transactions)	2013	2012	CD3 (1)	TRS (2)	CLN (3)	Other	2013	2012
	1	2	3	4	5	6	7=3+4+5+6	8
CL I - Central government and central banks								
CL VI - Institutions								
(1) CDS: Credit Default Sw aps								
(2) TRS: Total Return Sw aps								
(3) CLN - Credit Linked Notes								

On the same date, CEMG had the following investment exposure to credit derivatives, considering the market value:

			(thousands €)					
Transactions in Credit Derivatives	Long Pos 2013	Long Positions 2013 2012 2		Positions 2012				
I. Credit Portfolio (totals):								
a) Credit Default Swaps	134	9	54	181				
b) Total Return Swaps								
c) Credit Linked Notes		9.934						
d) Other Credit Derivatives								
II. Trading Transactions (totals):								
a) Credit Default Swaps								
b) Total Return Swaps								
c) Credit Linked Notes								
d) Other Credit Derivatives								
Long Positions Theoretical value of the aqui	irod protoction							

Table 7 – Credit Derivatives Instruments

Long Positions - Theoretical value of the aquired protection Short Positions - Theoretical value of the sold protection

5. Credit risk

5.1 Definitions

For accounting purposes, the following definitions apply:

- Past due credit: all payments of capital and interest not made on the date they fall due;
- Loans subject to impairment: all loans that, according to the analysis carried out individually—for Individually Significant loans—or collectively—for those included in the homogeneous populations—suggest expectations of loss or display impairment signs, as defined by the internal model (including past due loans, restructured credit and registration as a risky user in the Bank of Portugal's database, etc.);
- Past due loans: all loans with payments in arrears;
- Value corrections: derive from the regulatory provisioning of CEMG portfolio positions. On the date of initial recognition, credits are recorded at their face value, in accordance with the procedures defined in Bank of Portugal Notice 1/2005.



The value corrections for year-end 2012 and 2013 were 922 million euros and 1.051 million euros, respectively, as shown in Table 8.

Table 8 – Provisions and value corrections

	(th	ousands €)
Value Corrections and Provisions	Dec-13	Dec-12
Initial Balance	922.284	770.476
Charge for the year net of reversals	298.049	171.621
Recovery of loans and interest charged-off	-315.552	-179.651
Transfers/Others	146.745	159.838
Closing Balance	1.051.526	922.284

5.2 Portfolio Structure

The distribution of exposures in the loan portfolio by risk class shows a large concentration in the Positions Guaranteed by Real Estate and Corporate Loans classes, as there was in the previous year (Table 9).

			(t Orignial ex	housands €)			
		posure at	default (mean over the course				
Risk Class	defa	ault					
			of the	year)			
	Dec-13	Dec-12	Dec-13	Dec-12			
CL I - Central government and central banks	3.555.986	1.658.369	2.453.378	1.527.860			
CL II - Regional governments and local authorities	42.898	46.735	44.708	43.966			
CL III - Public sector entities and other non-profit public institutions	5.384	35.879	18.148	34.938			
CL IV - Multilateral development banks	0	0	0	0			
CL V - International organisations	0	0	0	0			
CL VI - Institutions	1.059.323	937.643	912.015	1.269.816			
CL VII - Corporations	5.906.023	5.669.068	5.379.360	5.274.806			
CL VIII - Retail portfolio	1.777.932	1.943.313	1.814.551	1.970.212			
CL IX - Garanteed by real estate	8.477.962	8.527.942	8.482.996	9.167.511			
CL X - Past due items	868.827	798.303	868.342	893.836			
CL XI - Covered bonds and public sector bonds	20.544	18.554	15.640	17.880			
CL XII - Exposures to colective investment undertakings (CIU)	513.136	408.927	458.090	474.543			
CL XIII - Other items	1.717.394	1.535.805	1.796.630	1.021.537			
Securitisation exposures using the standardised approach	9.403	14.794	10.625	15.000			
TOTAL	23.954.811	21.595.333	22.254.483	21.711.905			

Table 9 – Distribution of credit exposures by risk class

CEMG is commercially present in most regions (NUTS II⁵) of the country (Table 10), though a higher concentration is still seen in areas with higher population density (Lisbon, North and Center) when analyzing the geographic distribution of the loan portfolio.

⁵ NUTS II is the Unidades Territoriais para Fins Estatísticos de Nível II used by the National Institute of Statistics (INE).



Table 10 – Geographic distribution of exposures in the credit portfolio by risk class (as a % of original exposure at default)

				Geogra	afic distribu	tion of expo	sures		
				(as a % (of original e	exposure at	default)		
					Algarve		Azores	Madeira	Angola
	CL II - Regional governments and local authorities	0,15%	0,00%	0,04%	0,00%	0,00%	0,02%	0,05%	0,00%
	CL III - Public sector entities and other non-profit public institutions	0,01%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2	CL VI - Institutions	0,84%	0,07%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
201	CL VII - Corporations	13,63%	7,29%	4,68%	1,32%	0,74%	0,51%	0,43%	0,76%
	CL VIII - Retail portfolio	3,24%	3,68%	2,36%	0,73%	0,52%	0,35%	0,15%	0,07%
	CL IX - Garanteed by real estate	20,70%	12,53%	7,10%	2,77%	2,27%	1,88%	1,43%	0,00%
	CL X - Past due items	3,48%	3,38%	1,73%	0,53%	0,37%	0,09%	0,08%	0,01%
	TOTAL	42,04%	26,97%	15,92%	5,35%	3,90%	2,85%	2,13%	0,83%
	CL I - Central government and central banks	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,01%	0,00%
	CL II - Regional governments and local authorities	0,14%	0,00%	0,03%	0,00%	0,00%	0,02%	0,04%	0,00%
	CL III - Public sector entities and other non-profit public institutions	0,01%	0,02%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
2013	CL VI - Institutions	0,67%	0,07%	0,01%	0,00%	0,00%	0,00%	0,00%	0,00%
2(CL VII - Corporations	15,21%	7,42%	4,23%	1,09%	0,61%	0,60%	0,48%	1,13%
	CL VIII - Retail portfolio	2,74%	3,53%	2,17%	0,58%	0,49%	0,32%	0,13%	0,08%
	CL IX - Garanteed by real estate	20,37%	12,21%	7,15%	2,68%	2,33%	1,79%	1,38%	0,00%
	CL X - Past due items	4,05%	3,16%	1,88%	0,58%	0,39%	0,13%	0,05%	0,03%
	TOTAL	43,20%	26,41%	15,47%	4,93%	3,81%	2,85%	2,10%	1,23%

With regards to the distribution of the corporate portfolio by economic sector (Table 11), the construction sector deserves special attention, despite showing a decrease in its proportion, by -6,3 p.p., compared to Dec-12. There is also a significant proportion of loans in the Commerce, Finance, Insurance and Real Estate Management sectors, with the Finance and Insurance Activities registering a slight increase of about 4,1 p.p. over the last year.



Table 11 – Economic sector distribution of exposures in the credit portfolio by risk class (as a % of original exposure at default)

			Secondary	Sector	Tertiary Sector							
Year			Construction	Other	Wholesale and retail trade	Financial & Insurance	Real estate	Transport & Warehou sing	Hotels, Restaurants, etc.	Consultancy, Scientific, technical and a similar activities	Public administration	Other
	CL II - Regional governments and local authorities	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
	CL III - Public sector entities and other nonprofit public institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,64%	0,00%
2012	CL VI - Institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,06%
20	CL VII - Corporations	0,00%	0,00%	0,00%	0,00%	2,21%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
	CL VIII - Retail portfolio	0,94%	21,48%	10,46%	9,02%	5,09%	8,19%	2,69%	1,93%	2,02%	1,47%	4,53%
	CL IX - Garanteed by real estate	0,22%	1,54%	1,18%	2,39%	0,09%	0,85%	0,37%	0,81%	0,61%	0,65%	1,15%
	CL X - Past due items	0,03%	1,98%	0,19%	0,65%	0,12%	1,21%	0,04%	0,45%	0,06%	0,30%	0,21%
		0,11%	5,45%	1,81%	2,65%	0,24%	1,89%	0,28%	0,53%	0,22%	0,19%	0,82%
	TOTAL	1, 30 %	30,46%	13,65%	1 4,70%	7,75%	12,13%	3,39%	3,72%	2,90%	3,24%	6,76%
	CL I - Central government and central banks	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,02%	0,00%
	CL II - Regional governments and local authorities	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,54%	0,00%
2013	CL III - Public sector entities and other nonprofit public institutions	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%	0,07%
	CL VI - Institutions	0,00%	0,00%	0,00%	0,00%	1,67%	0,00%	0,00%	0,00%	0,00%	0,00%	0,00%
	CL VII - Corporations	0,74%	14,43%	11,00%	8,46%	9,23%	7,34%	4,29%	2,05%	2,56%	1,80%	4,39%
	CL VIII - Retail portfolio	0,19%	1,05%	1,05%	2,01%	0,12%	0,58%	0,48%	0,61%	0,57%	0,83%	1,03%
	CL IX - Garanteed by real estate	0,04%	3,10%	1,25%	1,18%	0,52%	1,27%	0,05%	0,79%	0,17%	0,26%	0,46%
	CL X - Past due items	0,13%	5,56%	1,51%	2,52%	0,28%	2,10%	0,16%	0,61%	0,31%	0,10%	0,53%
	TOTAL	1,11%	24,14%	14,81%	14,17%	11,82%	11,29%	4,98%	4,06%	3,61%	3,54%	6,48%
	the	1,1170		,0 1 /0	1-1,11 /0	11,02.70	. 1,2070	1,0070	-1,0070	0,0170	0,0-170	0,1070

(1) Public Administration and Defense; Social Security; Human health and welfare

In terms of distribution by residual maturity, as seen in the following table, about 50% of assets are long-term (residual maturity greater than 10 years). These assets are mostly in the class "Guaranteed by Real Estate" and consist of housing loans and investment loans to corporations. The portfolio with no set payment plan, which corresponds to about 14% of the overall original exposure, consists broadly of liquidity facilities for companies (revolving credit).



Table 12 – Residual maturity of the credit portfolio by risk class (as a % of original EAD)

		Residual maturity (as a % of original exposure at default)							
Yea		RM < 1	1 year < RM < 5 years	5 years < RM < 10 years	RM > 10 years	Revolving			
	CL II - Regional governments and local authorities	0,1%	0,0%	0,2%	0,0%	0,0%			
	CL III - Public sector entities and other non-profit public institutions	0,0%	0,0%	0,0%	0,0%	0,0%			
	CL VI - Institutions	0,2%	0,2%	0,1%	0,0%	0,4%			
12	CL VII - Corporations	7,7%	3,8%	5,1%	2,8%	9,9%			
20	CL VIII - Retail portfolio	1,8%	2,4%	2,6%	1,8%	2,5%			
	CL IX - Garanteed by real estate	0,5%	0,4%	2,7%	44,5%	0,6%			
	CL X - Past due items	2,9%	0,9%	0,8%	3,0%	2,1%			
	Total original exposure at default	13,1%	7,8%	11,5%	52,1%	15,6%			
	CL I - Central government and central banks	0,0%	0,0%	0,0%	0,0%	0,0%			
	CL II - Regional governments and local authorities	0,1%	0,1%	0,1%	0,0%	0,0%			
	CL III - Public sector entities and other non-profit public institutions	0,0%	0,0%	0,0%	0,0%	0,0%			
ŝ	CL VI - Institutions	0,2%	0,2%	0,2%	0,0%	0,2%			
2010	CL VII - Corporations	10,1%	4,0%	5,4%	3,0%	8,2%			
~	CL VIII - Retail portfolio	1,5%	2,0%	2,5%	1,6%	2,4%			
	CL IX - Garanteed by real estate	0,6%	0,8%	3,8%	42,0%	0,8%			
	CL X - Past due items	2,8%	0,8%	1,0%	3,3%	2,3%			
	Total original exposure at default	15,2%	7,9%	13,0%	49,9%	13,9%			

5.3 Concentration risk

As mentioned, CEMG has an ongoing diversification strategy in order to reduce the proportion of exposure related to the real estate sector. The impact of concentration risk on capital requirements is evaluated through the calculation of sector and individual concentration indexes (CI), according to the Bank of Portugal's Instruction 5/2011.

The individual Cl^6 is calculated from the 100 largest exposures, aggregated by client/economic group. The proportion of these exposures in Dec-13 amounted to roughly 16% of the loan portfolio and 19% of the total portfolio⁷.

The sector Cl⁸ is calculated based on the classification of clients' economic activities.

	Credit F	Portfolio	Total P	ortfolio
	Dec-13	Dec-12	Dec-13	Dec-12
Individual CI	0,24	0,18	0,31	0,29
Sector CI	tor Cl 12,2		11,8	13,6

Table 13 – Concentration indices

The decrease in the sector CI reflects the diversification strategy that the Institution has been pursuing in all portfolios, both at a sector and on an asset type level.

⁶ Customer Concentration Index = $\Sigma x^2 / (\Sigma x * \Sigma y) * 100$, where x represents the value of total exposure to each customer / economic group belonging to the institution's 100 largest counterparties, and Σy corresponds to the total exposure of the portfolio.

⁷ Total Portfolio = Loan Portfolio + Portfolios subject to capital requirements (including AFS – Available for Sale, HTM – Held to Maturity, Trading and of balance hedging).

⁸ Sector Concentration Index = $\Sigma x^2 / (\Sigma x)^{2*}$ 100, where x represents the total exposure in each economic sector.



With regard to the distribution of the largest exposures by country, the portfolio is almost entirely concentrated in Portugal (Table 14).

			(*	thousands €)	
Country	Exposure b	y country	% Total Portfolio		
Country	Dec-13	Dec-12	Dec-13	Dec-12	
Portugal	17.813	17.579	96,53%	95,99%	
Spain	135	85	0,73%	0,46%	
Ireland	65	68	0,35%	0,37%	
United Kingdom	61	85	0,33%	0,46%	
Italy	54	59	0,29%	0,32%	
Belgium	51	1	0,28%	0,01%	
Others	thers 275		1,49%	2,38%	
Total	18.453	18.314			

Table 14 – Distribution of exposures by Country

5.4 Past Due and Impaired Loans

The distribution of the past due exposures and the related impairment provisioning reflect the concentration of the activity in the business sectors of construction, commerce and real estate .

The geographical distribution of past due loans (Table 15) shows, in line with the total portfolio for 31 December, 2012, a larger concentration in the Lisbon, North and Central regions, reflecting the overall portfolio's geographical distribution.



Table 15 – Breakdown of past due and impaired exposures

Year			Total exposures	% Exposures past due	% Covered by impairment provisions
		Primary Sector		0,7%	43,6%
	0	Secondary Sector	Construction	38,4%	34,6%
	omic ent)		Others	12,8%	48,3%
	Breakdown by main economic sectors (Corporate segment)	Tertiary Sector	Wholesale and retail trade	18,7%	45,7%
	n e(Real estate activities	13,3%	37,2%
	mai		Other	5,7%	45,7%
	by orpo		Hotels, Restaurants, etc.	3,7%	27,4%
	(Cc		Transport & Warehousing	2,0%	42,6%
	ikdo		Financial & Insurance	1,7%	56,4%
12	Sect		Consultancy, Scientific, technical and similar activities	1,5%	37,9%
Dec-12	ш		Public admin. and defense; Social Security; Human health and welfare	1,4%	20,4%
Δ		Total		100,0%	39,6%
		Lisbon		36,0%	31,5%
	⊂	North		34,9%	41,9%
	reakdown by mair geografic regions	Center		17,9%	33,8%
	by I	Algarve		5,5%	26,6%
	iwn fic r	Alentejo		3,8%	32,1%
	kdo igra	Azores		1,0%	28,9%
	Breakdown by main geografic regions	Madeira		0,8%	22,6%
	ш	Angola		0,1%	4,7%
		Total		100,0%	35,2%
		Primary Sector		0,9%	29,6%
	0	Secondary Sector	Construction	40,3%	33,4%
	ent		Others	11,0%	44,2%
	Breakdown by main economic sectors (Corporate segment)	Tertiary Sector	Wholesale and retail trade	18,2%	44,8%
	e se		Real estate activities	15,2%	31,2%
	ma		Hotels, Restaurants, etc.	4,4%	23,5%
	n by orpo		Other	3,8%	45,9%
	OWL (C		Consultancy, Scientific, technical and similar activities	2,2%	38,6%
	tors		Financial & Insurance	2,0%	33,7%
13	Sec		Transport & Warehousing	1,2%	44,9%
Dec-13	_		Public admin. and defense; Social Security; Human health and welfare	0,7%	31,5%
		Total		100,0%	36,6%
		Lisbon		39,4%	34,2%
	.=	North		30,8%	38,5%
	ma	Center		18,3%	33,3%
	Breakdown by main geografic regions	Algarve		5,6%	26,2%
	owr afic	Alentejo		3,8%	34,5%
	akdı ogra	Azores		1,3%	28,1%
	Bre; gei	Madeira		0,5%	32,9%
		Angola		0,3%	4,9%
		Total		100,0%	34,8%

5.5 Standard Approach

The capital requirement for credit and counterparty risk is determined in accordance with the Standard Approach as defined in the Bank of Portugal's Notice 5/2007. Depending on the nature of the counterparty, asset portfolio positions are assigned to one of several risk classes, and ratings provided by Moody's, S&P and Fitch are used in the attribution of risk weights.



This use is common to all risk classes and is in accordance with Notice 5/2007, as follows:

- When different ratings are simultaneously issued by separate recognized agencies, the second highest of the two best risk weights applies;
- In the case of bonds or similar securities, the issue rating is used, and the issuer rating applied only in cases where an issue rating is not available;
- Existing ratings are used consistently for all exposures in all classes.

The value of risk-weighted exposures is calculated based on the exposure value, net of provisions and value corrections, considering the effect of credit risk mitigation techniques namely real and personal credit protections—and after the application of conversion factors to off-balance sheet elements.

As of December 2013, the distribution of CEMG's portfolio among the different classes and risk weights are presented in detail in the following table.



Table 16 – Regulatory capital, counterparty and credit risk requirements

						Risk weigt	nts			(1	housands (
		0%	10%	20%	35%	50%	75%	100%	150%	Other	
	CL I - Central government and central		0		0	0	0				0.555.00
	banks	3.486.721	0	66.793	0	0	0	2.473	0	0	3.555.98
	CL II - Regional governments and local authorities	0	0	42.898	0	0	0	0	0	0	42.89
	CL III - Public sector entities and other										
	non-profit	0	0	12	0	0	0	5.371	0	0	5.38
(0	public institutions	0	0	0	0	0	0	0	0	0	
class	CL IV - Multilateral development banks	0	0	0	0	0	0	0	0	0	
Original exposure by risk class	CL V - International organisations CL VI - Institutions	795	0	349.360	0	0	0	709.168	0	0	
by r	CL VII - Corporations	0	0	982	0	6,417		5.898.573	50	0	5.906.0
sure	CL VIII - Retail portfolio	0	0	0	0		1.777.932	0	0	0	1.777.9
sodx	CL IX - Garanteed by real estate	0	0		7.550.740	327.445	331.091	268.685	0	0	8.477.9
al e)	CL X - Past due items	0	0	0	0	0	0	642.264		0	868.8
rigin	CL XI - Covered bonds and public sector										
0.	bonds	0	1.308	0	0	19.236	0	0	0	0	20.5
	CL XII - Exposures to colective	0	0	0	0	0	0	400.004	10.000	0	540.4
	investment undertakings (CIU)	0	0	0	0	0	0	493.334	19.802	0	513.1
	CL XIII - Other items	180.434	0	154.411	0	0	0	1.382.550	0	0	1.717.3
	Securitisation exposures using the	0	0	0	0	0	0	9.403	0	0	9.4
	standardised approach										
	TOTAL of original exposures:	3.667.949	1.308	614.456	7.550.740	353.099	2.109.023	9.411.821	246.415	0	23.954.8
	CL I - Central government and central banks	3.486.721	0	66.793	0	0	0	2.473	0	0	3.555.9
Exposures by risk class (basis for RW application)	CL II - Regional governments and local	0	0	42,126	0	0	0	0	0	0	42.1
	authorities	0	0	42.120	0	0	0	0	0	0	42.1
	CL III - Public sector entities and other non-profit	0	0	12	0	0	0	3.695	0	0	3.7
	public institutions	0	0	12	0	0	0	5.035	0	0	0.7
	CL IV - Multilateral development banks	0	0	0	0	0	0	0	0	0	
R	CL V - International organisations	0	0	0	0	0	0	0	0	0	
s for	CL VI - Institutions	57.797	0	331.991	0	0	0	632.340	0	0	1.022.1
oasi	CL VII - Corporations	0	0	982	0	6.417	0	5.338.914	50	0	5.346.3
ss (l	CL VIII - Retail portfolio	0	0	0	0	0	1.363.645	0	0	0	1.363.6
Cla	CL IX - Garanteed by real estate	0	0	0	7.550.740	327.445	326.947	264.874	0	0	8.470.0
ris k	CL X - Past due items	0	0	0	0	0	0	654.711	213.743	0	868.4
s by	CL XI - Covered bonds and public sector	0	1.308	0	0	19.236	0	0	0	0	20.5
sure	bonds CL XII - Exposures to colective										
sody	investment	0	0	0	0	0	0	493.334	19.802	0	513.1
5 5	undertakings (CIU)										
	CL XIII - Other items	180.434	0	154.411	0	0	0	1.382.550	0	0	1.717.3
	Securitisation exposures using the standardised approach	0	0	0	0	0	0	9.403	0	0	9.4
	TOTAL exposures:	3.724.951	1.308	596 315	7.550.740	353 099	1 690 592	8.782.295	233 595	0	22.932.8
τοτ	L risk weighted exposures										
				119.263		176.550	1.267.944	8.782.295	350.393		13.339.3
	CL I - Central government and central	0	0	1.069	0	0	0	198	0	0	1.2
	banks CL II - Regional governments and local										
	authorities	0	0	674	0	0	0	0	0	0	e
	CL III - Public sector entities and other										
	non-profit	0	0	0	0	0	0	296	0	0	2
0	public institutions CL IV - Multilateral development banks	0	0	0	0	0	0	0	0	0	
() ()	CL V - International organisations	0	0	0	0	0	0	0	0	0	
66	CL VI - Institutions	0	0	5.312	0	0	0	50.587	0	0	
ts "	CL VII - Corporations	0	0	16	0	257	0	427.113	6	0	
eigh	CL VIII - Retail portfolio	0	0	0	0	0	81.819	0	0	0	
Ň	CL IX - Garanteed by real estate	0	0	0	211.421	13.098	19.617	21.190	0	0	
'x" risk weights "x" 8%)	CL X - Past due items	0	0	0	0	0	0		25.649	0	
2. "X	CL XI - Covered bonds and public sector										
(2. "x" risk weights "x" 8%)	bonds	0	10	0	0	769	0	0	0	0	7
0	CL XII - Exposures to colective							00.00	0.000		
	investment undertakings (CIU)	0	0	0	0	0	0	39.467	2.376	0	41.8
	CL XIII - Other items	0	0	2.471	0	0	0	110.604	0	0	113.0
	Securitisation exposures using the										
	standardised approach	0	0	0	0	0	0	752	0	0	7
	TOTAL capital requirements:	0	10	9.541	211.421	14.124	101.436	702.584	28.031		1.067.1



6. Credit risk mitigation techniques

Both personal guarantees, which substitute the risk of one counterparty for another, and financial collateral, which directly reduces the value of the exposure, are used to reduce credit risk for the positions held in the loan portfolio. Mortgage collateral is also a relevant risk mitigating technique in the CEMG portfolio.

CEMG does not generally use on- or off-balance sheet compensation methods, and does not originate credit derivatives for its loan portfolio.

Exposures with risk mitigation via risk substitution are mostly corporate/business loans guaranteed by Mutual Guarantee companies (Agrogarante, Norgarante, Lisgarante and Garval).

Loans in which risk is reduced directly correspond mainly to those collateralized by financial securities, namely term deposits, gold, bonds and shares included in a main index of a recognized stock exchange, as presented in Annex VI to Bank of Portugal's Notice 5/2007.

With regards to mortgage collateral, property evaluations are performed by independent specialists or an independent department. The re-evaluation of these assets is done in accordance with the requirements defined in Notice 5/2007, using real estate price variation indices⁹ or on-site assessments.

Property for housing	 At least once every three years, automatically, using real estate variation indices. For loans exceeding 5% of regulatory capital of the Institution or 500.000 euros, the assessment of the property must be
Property for commercial purposes	reviewed by an evaluator. - At least once a year, automatically through the use of indices, using real estate variation indices.
	- For loans exceeding 5% of regulatory capital or 1 million euros, the assessment of the property must be reviewed by an evaluator at least every three years.

Table 17 – Property Re-evaluation

⁹ Based on data provided by Credit Institutions and Real Estate Brokers.



Table 18 – Credit risk mitigation techniques

								(thousands €)	
		Credit risk		techniqu on net ex	Mitigation techniques which reduce the value of exposure				
Risk Class	Net exposure	Personal p mitigation			credit ection	Efect of substitution	Volatility ajustment to	Financial Colateral:	
		Guarantees	Credit derivatives	Simple Method	Other	on exposure ⁽¹⁾	exposure value	mitigation amount	
	1	2	3	4	5	6	7	8	
Total exposure	23.954.811	212.947	0	0	0	63.627	0	314.076	
CL I - Central government and central banks	3.555.986	0	0	0	0	0	0	0	
CL II - Regional governments and local authorities	42.898	225	0	0	0	0	0	166	
CL III - Public sector entities and other non-profit public institutions	5.384	0	0	0	0	0	0	1.310	
CL VI - Institutions	1.059.323	57.400	0	0	0	57.400	0	19.840	
CL VII - Corporations	5.906.023	141.016	0	0	0	0	0	163.288	
CL VIII - Retail portfolio	1.777.932	0	0	0	0	0	0	121.507	
CL IX - Garanteed by real estate	8.477.962	1.790	0	0	0	0	0	7.955	
CL X - Past due items	868.827	12.516	0	0	0	6.227	0	9	
CL XI - Covered bonds and public sector bonds	20.544	0	0	0	0	0	0	0	
CL XII - Exposures to colective investment undertakings (CIU)	513.136	0	0	0	0	0	0	0	
CL XIII - Other items	1.717.394	0	0	0	0	0	0	0	
Securitisation exposures using the standardised approach	9.403	0	0	0	0	0	0	0	

(1) - This field is calculated as follow s: G*P1 - G*P2, where G is the amount of the guarantee, P1 the original RW and P2 the RW after taking into account the guarantee.

Table 19 – Concentration Analysis – Personal and real credit protection

				(thousands €)		
	Personal credit	protection	Real credit protection - Integra method for financial colateral			
	Guarante		Eligible (financial) collateral			
	Dec-13	Dec-12	Dec-13	Dec-12		
CL I - Central government and central banks	0	0	0	0		
CL II - Regional governments and local authorities	225	0	166	107		
CL III - Public sector entities and other non- profit public institutions	0	0	1.310	1.278		
CL VI - Institutions	57.400	59.627	19.840	52.817		
CL VII - Corporations	141.016	112.366	163.288	188.131		
CL VIII - Retail portfolio	0	0	121.507	104.834		
CL IX - Garanteed by real estate	1.790	966	7.955	6.571		
CL X - Past due items	12.516	12.092	9	20		
CL XI - Covered bonds and public sector bonds	0	0	0	0		
CL XII - Exposures to colective investment undertakings (CIU)	0	0	0	0		
CL XIII - Other items	0	0	0	0		
Securitisation exposures using the standardised approach	0	0	0	0		



7. Securitizations

7.1 Current involvement

As of 31 December, 2013, CEMG was involved in the following traditional credit securitization operations as originator: Pelican Mortgages 1, Pelican Mortgages 2, Pelican Mortgages 3, Pelican Mortgages 4, Pelican Mortgages 5 and Pelican SME 1 (Table 20). As a result of the acquisition of Finibanco Holding, CEMG took on, and is thus considered the originator of Aqua Mortgage 1 and Aqua Finance 3 (via Montepio Crédito). In all of these operations, the main goal was to achieve greater flexibility in managing the balance sheet, with a positive impact on liquidity indicators, for instance.

The degree of involvement, understood to be the quotient between the volume of global debt exposures assigned in securitization transactions and the sum of consolidated assets (plus the overall volume of assigned positions), was below 20%.

For regulatory purposes, none of the aforementioned securitizations involved a significant transfer of credit risk.

7.2 Calculation Methods for risk-weighted exposures

Given that none of these securitization operations meets the criteria set out in Annex I to Bank of Portugal Notice 7/2007—which defines the conditions for a significant transfer of credit risk the loans involved are not excluded from the calculation of risk-weighted assets. Capital requirements are therefore not calculated for the securitization exposures held and losses on these positions are not considered.

With regard to securitizations where CEMG acts as an investor, the risk-weighted exposure is calculated according to Notice 7/2007 of the Bank of Portugal, using the Standardized Approach. Credit ratings issued by Fitch, Moody's and S&P were used to determine the credit quality of each securitization position.

7.3 Accounting policies

Until 31 December, 2004, in accordance with the accounting principles defined by the Bank of Portugal, loans transferred by CEMG through securitization deals were derecognized. Securities acquired as a result of those operations were considered as assets available for sale and provisioned according to the rules defined in the Bank of Portugal's Instruction 27/2000. Following the publication of the Bank of Portugal's Instruction 2/2008, the provisioning of these securities was subject to the impairment rules as defined in IAS 39.

In line with IFRS 1, no changes have been made to the derecognition criterion adopted in CEMG's individual financial statements for all securitizations issued carried out prior to 1 January, 2004. All operations carried out after that date are analyzed according to the rules set out in IAS 39, which stipulates that if a substantial portion of the risks and benefits associated with the assets are transferred, or control over the assets is transferred, those assets may be derecognized.



7.4 Quantitative information

Table 20 – Securitization Operations

			S	ecuritisatior	n Operation	S		(thousands €
Traditional securitisation									
Originator	CEMG	CEMG	CEMG	CEMG	CEMG	CEMG	CEMG	CEMG	Montepio Crédito
Issuer	Navegator SGFTC, SA	Banco Finantia, SA	Sagres STC, SA	Tagus STC, SA	Tagus STC, SA				
Information on the operations									
Start date	19-Dec-02	29-Sep-03	30-Mar-07	20-May-08	25-Mar-09	5-Mar-12	22-Jun-10	09-Dec-08	30-Jun-09
Legal maturity	Sep-37	Sep-36	Sep-54	Sep-56	Dec-61	Dec-63	Jul-36	Dec-63	Dec-23
Step-up clause (date)	n.a.	Sep-10	Mar-16	Jun-17	Jun-18	n.a.	Jul-13	n.a.	n.a.
Revolving (years)	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	3	2	3
Securitised assets (in millions of euros)	650	700	750	1.000	1.000	1.040	1.167	233	173
Outstanding amount (in millions of euros)	72	143	323	781	796	992	413	175	129
Information on involvement of originator(s)									
Existence of situations of "implicit support"	no	no	no	no	no	no	no	no	no
Assets ceded (by institution)/Securitised Assets (total) (%)	100,0%	100,0%	100,0%	100,0%	100,0%	100,0%	100,0%	100,0%	100,0%
Inicial capital-gains/Value of repurchased firstloss position	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00	0,00

n.a. = not aplicable

Table 21 – Outstanding exposure amount on securitized loans

	Amount	(millions €) Of which: relating to exposures subject to impairment or past due
Pelican 1	72	3
Pelican 2	143	1
Pelican 3	323	1
Pelican 4	781	3
Pelican 5	796	2
Pelican 6	992	8
Pelican SME 1	413	17
Aqua Mortgage 1	175	5
Aqua Finance 3	129	15
Traditional securitisations (total)	3.825	56



Table 22 – Credit risk – Securitization Operations: Standardized Approach

				(thousands €)	
	Exposi	ure amount	Risk weighted exposure		
Type of securitisation (tradicional/synthetic)		- Amount deducted from regulatory capital	Dec-13	Dec-12	
				10	
B=Investor positions: total	9.403	0	9.403	10.655	
B1 - On-balance sheet exposures	9.403	0	9.403	10.655	
Securitisations	9.403	0	9.403	10.655	
Resecuritisations	0	0	0	0	
B2 - Off-balance sheet items and derivatives	0	0	0	0	
C=lssuer positions: total	0	0	0	0	
C1 - On-balance sheet exposures	0	0	0	0	
C2 - Off-balance sheet items and derivatives	0	0	0	0	

Table 23 – Credit risk – Securitization Operations: Activities Summary

					(millions €)
Type of securitisation (tradicional/synthetic)	Securitised exposure		Risk weighted exposure		Gains / Losses recognised on sales	
	Dec-13	Dec-12	Dec-13	Dec-12	Dec-13	Dec-12
Tradicional securitisations (total)	3.825	4.174	0		0 0	0
On-balance sheet exposures	3.825	4.174	0		0 0	0
Securitisations	3.825	4.174	0		0 0	0
Resecuritisations	0	0	0		0 0	0
Off-balance sheet items and derivatives	0	0	0		0 0	0
Synthetic securitisations (total)	0	0	0		0 0	0
On-balance sheet exposures	0	0	0		0 0	0
Securitisations	0	0	0		0 0	0
Resecuritisations	0	0	0		0 0	0
Off-balance sheet items and derivatives	0	0	0		0 0	0



8. Position, credit, counterparty and settlement risk on the trading book

8.1 Methods of calculation of capital requirements

The trading book portfolio is composed of positions held with the aim of achieving short-term gains, either through sales or by revaluation. Capital requirements are calculated using the Standardized Approach.

8.2 Methods for assessing risk on the trading book

The trading book is fully covered by the "standardized approach to the trading book".

In accordance with the standardized approach, the financial assets are split into two classes: debt instruments (including derivatives and comparable debt instruments) and equity securities (including derivatives on equity instruments and comparable assets).

The capital requirement for each asset class is calculated according to the specific risk and overall risk hedging for each asset class. Thus, according to the standardized approach, the following methodologies are applied to each type of exposure:

Debt Instruments

- General risk: refers to the risk of loss caused by unfavorable changes in interest rates. In order to calculate the regulatory capital requirements for general risk, a method based on maturity is used, in accordance with Section II-B, Part 2 of Annex II of the Bank of Portugal's Notice 8/2007.
- Specific risk: refers to the risk of loss due to factors associated with the issuer, and the
 regulatory capital requirements for these risks are based on the methodology described
 in Section II-A, Part 2 of Annex II to Notice 8/2007, considering the changes introduced
 by the Bank of Portugal's Notice 8/2010, which results in the weighting of assets in
 accordance with the sector and the credit quality of the issuer.

Equities

- General risk: refers to the risk of loss caused by unfavorable changes in the stock market. To calculate the regulatory capital requirements for general risk, the method described in Sections III-B and III-C, Part 2 of Annex II of the Bank of Portugal's Notice 8/2007 is used, resulting in the multiplication of the overall net position by 8%;
- Specific risk: refers to the risk of loss due to factors associated with the issuer. The
 regulatory capital requirements for these risks are based on the methodology described
 in Section III-A, Part 2 of Annex II of Notice 8/2007, which results in the multiplication of
 the gross position overall by 8%;
- Positions in collective investment undertaking: in accordance with Section VI, Part 2 of Bank of Portugal's Notice 8/2007, these positions are subject to an own funds requirement of 32%.



8.3 Quantitative information

		(*	thousands €)
	Trading book risks	Regulatoty requirer	
		Dec-13	Dec-12
Total of trad	Total of trading book risks (1 + 2)		4.807
1.	Position risk	3.964	4.201
1.1.	Standardised approach to the trading book	3.964	4.201
1.1.1.	Debt instruments		
1.1.1.1.	Specific risk	2.049	1.396
1.1.1.2.	General risk	646	680
1.1.2.	Equities		
1.1.2.1.	Specific risk	516	1.003
1.1.2.2.	General risk	516	1.003
1.1.3.	Organismos de Investimento Colectivo (OIC)	236	120
2.	Counterparty credit risk	353	606
2.1	Bonds	0	0
2.2	Derivatives	353	606
2.3	Other	0	0

Table 24 – Regulatory capital requirements (trading book)

In quantitative terms, using the methods described above, the regulatory capital requirements amounted to 4.317.035 euros for the trading portfolio, which represents a decrease of 490.301 euros in comparison to the previous year resulting from reductions in capital requirements for credit risk of derivatives and for position risk on equity securities.

9. Exchange rate and commodity risks on the banking and trading books

9.1 Method of calculation of minimum regulatory capital requirements

The method used by CEMG to calculate the regulatory capital requirements to cover currency and commodity risks is the standardized approach, as defined in Annexes V and VI of the Bank of Portugal's Notice 8/2007.

9.2 Evaluation method of exchange and commodities risk

For the calculation of regulatory capital requirements, according to Annex V of the Bank of Portugal's Notice 8/2007, the standardized method imposes a weight of 8% (or 4% when dealing with closely correlated currencies) on the aggregate net positions in foreign currencies, if this sum exceeds 2% of total regulatory capital.

With regards to commodity risk, due to the inexistence of outright or derivative commodity exposures as of 31 December, 2012, application of the calculations described in Annex VI of the Bank of Portugal's Notice 8/2007 was not required.



9.3 Quantitative information

As of 31 December, 2013, the net foreign currency position represented approximately 0,02% of the regulatory capital, therefore there was no allocation of capital to cover currency risk, given the limits described in the previous section.

10. Equity exposures in the banking book

10.1 Management goals

Equity investment in CEMG's banking book assumes marginal proportions, with regards to both the portfolios managed and the balance sheet.

This conservative attitude towards risk has meant that the adverse conditions that characterized the stock market in the recent past had no significant negative impact on profitability or regulatory ratios.

10.2 Accounting techniques and assessment methods used

Capital losses on equity exposures are accounted for according to the portfolios in which these securities are classified, the cumulative value of the losses and the length of time for which the losses have existed. Capital losses on equity registered in the trading book have an immediate effect on results. Reductions in the value of shares categorized as available for sale are classified as impairment and affect results if greater than 30% or if the situation persists for a period of more than 12 months. In the remaining cases, capital losses are recorded in revaluation reserves, affecting equity.

10.3 Quantitative information

Table 25 – Equity exposure

					(thou	sands €)
	Listed shares		ted shares Unlisted shares		Total	
	Dec-13	Dec-12	Dec-13	Dec-12	Dec-13	Dec-12
Acquisition cost	29.280	20.855	406.885	379.305	436.166	400.160
Fair value	27.865	19.957	403.347	375.767	431.212	395.724
Market price	27.865	19.957			27.865	19.957
Results for the year arising from sales and settlements					1.318	1.306
Total unrealized gains and losses					2.117	1.072
Total gains and losses inherent in latent revaluations					-7.070	-5.508



11. Operational risk

Operational risk consists of the risk of losses as a result of shortcomings or failures in internal processes, human resources, systems or external factors.

Montepio obtained authorization from the Bank of Portugal, effective 30 June 2010, to adopt the standard method (TSA) for the calculation of minimum capital requirements for operational risk. With the larger perimeter of consolidation in 2011, this method is being implemented in the remaining companies within the group.

In 2013, the calculation of capital requirements for Montepio Crédito has started to be done using the standard method and it is intended to continue to extend that methodology to the remaining entities.

As of December 31, 2013, the operational risk capital requirements for CEMG, MG Cabo Verde and Montepio Crédito were calculated using the standard approach (TSA). For Montepio Investimento and Finibanco Angola, the requirements were calculated according to the basic indicator approach (BIA). As a result, the consolidated capital requirements to cover operational risk were 63,2 million euros on December 31, 2013.

In the Basic Indicator Approach, regulatory capital requirement to cover operational risk is calculated as the average of the relevant positive yearly indicator over the last three years, multiplied by 15%. In the Standard Method this capital requirement corresponds to the average of the relevant positive yearly indicator, across each of the business lines, over the last three years, multiplied by a factor assigned to each business line, according to the Bank of Portugal's definitions.

The accounting information taken into consideration in calculating the relevant indicator is aligned with Bank of Portugal's Instruction 23/2007, with the exception of accounts that do not stem from CEMG's current activity, according to the provisions of article n^o.5, subparagraph d) of Annex I to Bank of Portugal's Notice 9/2007.

The criteria for each business segment follow the Bank of Portugal's Notice 9/2007. The table below describes the relationship between the business segments and the list of activities in CEMG:

	Activity				
Corporate Finance	- Underwriting;				
	- Consulting services on capital structure, industrial strategy and other related or				
	consulting questions, along with services related to mergers and acquisitions by				
	companies;				
Trading and sales	- Proprietary positions;				
	- MMI Brokerage;				
	- Reception and transmission of orders in relation to one or more financial instruments;				
	- Execution of orders on behalf of clients;				
Payment and settlement	- Issue and administration of payment services;				
	- Payments operations;				
Commercial banking	- Retail deposits and investment funds;				
Retail banking	- Private lending;				
	- Finance leases;				
	- Guarantees;				
Agency services	- Safekeeping and administration of financial instruments on behalf of clients, including				
	custody and related services, such as treasury/ collateral management;				
Retail brokerage	 Reception and transmission of orders in relation to one or more financial instruments; 				
	- Execution of orders on behalf of clients.				
Asset Management	- OICVM management.				

Table 26 – Business Line Mapping



Table 27 – Capital Requirements of Operational Risk

				(thousands €)
Business Line	Rele	Regulatory capital		
	2011	2012	2013	requirement
Total	475.938	433.442	419.973	63.169
1.Total of activities subject to Basic Indicator method	22.185	37.091	43.127	5.120
2. Total of activities subject to Standard method	453.753	396.351	376.846	58.049
2.1. Corporate Finance	1.107	2.317	4.644	
2.2. Trading and sales	-9.264	-44.818	-14.602	
2.3. Retail brokerage	5.105	7.999	7.612	
2.4. Commercial banking	226.332	305.742	277.251	
2.5. Retail banking	194.958	86.862	63.672	
2.6. Payment and settlement	31.256	33.094	32.646	
2.7. Agency services	4.259	5.156	5.623	
2.8. Asset Management	0	0	0	

12. Analysis of sensitivity of Capital requirements

12.1 Interest rate risk on the banking book

Identifying, measuring and controlling interest rate risk on CEMG's banking book are among the tasks of the DRI. CEMG's interest rate risk management is based on the principles recommended by the *Bank for International Settlements*.

Measurement and assessment of the interest rate risk on CEMG's banking book essentially uses two methods:

- Repricing gap (most commonly used);
- Market value/duration.

These methods use the following components in constructing the simulation:

- Remunerated assets and liabilities that make up CEMG's balance sheet (balance, currency, repricing date, maturity date, contract interest rate, type of indexing rate, interest rate renewal period and type of repayment);
- Off-balance sheet accounts (in particular interest rate swaps);
- New volumes strategies (amounts, pricing and repricing);
- Projection of interest and exchange rates;

The repricing gap method calculates the value of assets and liabilities that renew their interest rate within a certain period ("time bucket"), normally one month. The difference between the value of assets and liabilities that renew their interest rate within a certain period represents a gap, which will be positive (negative) if the total value of assets is higher (lower) than the total value of liabilities.

The repricing models can be:

• Static: concerned only with the balance sheet and off-balance sheet position at the end of each month;



• Dynamic: concerned with the balance sheet and off-balance sheet position forecast for subsequent months, based on the initial situation and the expected development of various business variables, such as volumes, interest rate renewal periods, early settlements and mobilizations.

The models are based on the following methodological approaches:

- Remunerated assets and liabilities are grouped according to repricing period, type of reference rate and purpose of operation;
- Fixed-rate remunerated assets and liabilities are regarded as undergoing repricing on their maturity date;
- Currently, coefficients take into account the residual maturity of the contracts, instead of considering early mobilization (of deposits and credit).

For remunerated assets and liabilities that are not directly indexed to a market rate, the repricing date corresponds to the expiration date. Likewise, the same process is applied to the fixed leg of interest rate swaps.

On-demand deposits are regarded subject to repricing every one to two years, noting that changes to the remuneration of these deposits are made only administratively.

12.2 Stress tests

CEMG performs quarterly stress tests exercises taking into account adverse macroeconomic and financial scenarios defined by Bank of Portugal, under the financial aid program to the Portuguese Republic.

In addition to the stress tests reported to the Bank of Portugal, CEMG regularly conducted other impact studies that intend to provide an analytical view of its position in terms of liquidity, profits and capital when subject to unfavorable scenarios stemming from changes in risk factors such as interest rates, credit spreads, deposit runoffs, eligible asset evaluation haircuts applied by the Central European Bank (ECB), credit ratings (for CEMG and issuing bodies), portfolio and collateral losses, among other factors.

The results under the adverse scenarios, including those resulting from the adverse macroeconomic scenarios defined by Bank of Portugal under the financial aid program to the Portuguese Republic, show that CEMG continues to enjoy suitable capitalization levels.

The impact studies and results are disclosed to and discussed with the board of directors, being the subsequent conclusions incorporated in the strategic decision making processes, namely in the determination of levels of solvency, liquidity, exposure to specific risks (counterparty and price risks) and global risks (interest rate, foreign exchange and liquidity risks), as well as in the pricing, loan criteria and development of products offered.

12.3 Quantitative information - interest rate risk

The following is the information reported biannually to the Bank of Portugal on "Interest rate risk (banking book)", on a consolidated basis, considering the impact of a rate shock of (+-) 200 b.p.:



Table 28 – Interest rate risk (banking book)

		_		(thousands €)		
			Dec-13	Dec-12		
Efect on equity od a parallel shift of _ 200 b.p. in interest rate		+	109.017	142.686		
	Amount	109.017				
	% Regulatory	+	6,22%	7,69%		
	capital	-	-6,22%	-7,69%		
	Сарна	-	-0,22%	-7,09%		

"+" = upward parallel shift of 200 b.p. in the interest rate

"-" = downward parallel shift of 200 b.p. in the interest rate

Calculated in accordance with the methodology laid down in Instruction 19/2005, the impact on equity of a parallel shift of + 200 b.p. in the interest rate curve is 6,22% of the regulatory capital (see Table 28). The sensitivity of the banking book to interest rate risk is thus within the guidelines defined by the BIS in "Principles for the Management and Supervision of Interest Rate Risk" (20% limit).