ML UK Capital Holdings Limited
Including Merrill Lynch International

Pillar 3 Disclosure

For the Quarter Ended 30 June 2019

1. Overview and Purpose of Document

This document contains certain Pillar 3 disclosures for the quarter ended 30 June 2019 of ML UK Capital Holdings Limited ("MLUKCH"), its sole operating subsidiary Merrill Lynch International ("MLI" or "the Company") and its other non-operating subsidiaries (together "the Group" or "the MLUKCH Group").

MLUKCH's ultimate parent company is Bank of America Corporation ("BAC" or "the Enterprise") and it acts predominantly as the holding company for MLI. In accordance with Regulation (EU) 575/2013 – the Capital Requirements Regulation ("CRR") MLUKCH complies with the Pillar 3 requirements on a consolidated basis.

In accordance with the European Banking Authority ("EBA") guidelines on materiality, proprietary and confidentiality and on disclosure frequency relating to Pillar 3 disclosures ("the Guidelines"), MLUKCH as the parent of MLI has determined that it is appropriate to disclose the information prescribed by these guidelines on a quarterly basis. This document contains these disclosures, which includes information on capital adequacy, leverage and liquidity.

The information contained herein predominantly relates to MLI as the sole operating subsidiary of MLUKCH. For further information on MLI's risk management objectives and policies, liquidity and asset encumbrance, please refer to the MLUKCH Group annual Pillar 3 disclosure for the year ended 31 December 2018 on BAC's corporate website:

http://investor.bankofamerica.com

1.1 ML UK Capital Holdings

The MLUKCH Group is supervised on a consolidated basis in the UK by the Prudential Regulation Authority ("PRA") and the Financial Conduct Authority ("FCA"). The principal activity of MLUKCH is to act as a holding company for MLI. MLUKCH also acts as a holding company for a small number of non-operating subsidiaries.

MLUKCH is not itself a risk taking entity and the risk is booked in its operating subsidiary MLI, where the business is managed.

1.2 Merrill Lynch International

MLI is a wholly owned subsidiary of MLUKCH. MLI's ultimate parent is BAC. MLI is BAC's largest operating subsidiary outside of the US and serves the core financial needs of global corporations and institutional investors.

MLI's head office is in the United Kingdom with branches in Dubai and Qatar along with a representative office in Zurich. The firm has the ability to trade throughout the European Economic Area ("EEA") and conduct business with international clients. MLI is authorised by the PRA and regulated by the FCA and PRA.

As at 30 June 2019, MLI was rated by Fitch Ratings, Inc ("Fitch") (A+/F1) and Standard & Poor's ("S&P") (A+/A-1).

1.3 Other Entities

Other entities, although consolidated into the Group, are not separately disclosed in this document on the grounds of materiality.

1.4 MLI's Capital Position at 30 June 2019

Figure 1 illustrates MLI's key capital metrics. MLI's Capital Resources consist entirely of Common Equity Tier 1 ("CET1") capital and MLI continues to maintain capital ratios and resources significantly in excess of its minimum requirement.

Figure 1. Summary of MLI's Key Metrics as at 30 June 2019



Note: All of MLI's Tier 1 capital is CET1, therefore CET1 Capital Ratio and Tier 1 Capital ratio are the same.

2. Basis of Preparation

The information contained in this disclosure has been prepared in accordance with the Basel III rule framework, for the purpose of explaining the basis on which the MLUKCH Group and MLI have prepared and disclosed certain information about the application of regulatory capital adequacy rules and concepts. It therefore does not constitute any form of financial statement on MLUKCH or its subsidiaries, or of the wider Enterprise, and as such, is not prepared in accordance with International Financial Reporting Standards ("IFRS") or Financial Reporting Standard 101 'Reduced Disclosure Framework' ("FRS 101"). Therefore the information is not directly comparable with the annual financial statements and the disclosure is not required to be audited by external auditors.

In addition, the report does not constitute any form of contemporary or forward looking record or opinion on the Group, the Company or the Enterprise. Although the Pillar 3 disclosure is intended to provide transparent information on a common basis, the information contained in this document may not be directly comparable with the information provided by other banks. Any financial information included herein is unaudited.

The basis of consolidation used for the MLUKCH Group for prudential purposes is the same as the consolidation used for accounting purposes. Figures for the Group are presented on a consolidated basis. Figures for MLI are presented on a solo basis.

This Pillar 3 disclosure is published on BAC's corporate website: http://investor.bankofamerica.com.

Transitional Impact of IFRS9

IFRS 9 addresses the classification, measurement and recognition of financial assets and financial liabilities. It replaces the guidance in IAS 39 – Financial Instruments: Recognition and Measurement that relates to the classification and measurement of financial instruments.

Based on materiality no further disclosures for the transitional impact of IFRS9 are made in this document.

3. Capital Resources

Capital resources represent the amount of regulatory capital available to an entity to cover all risks. Defined under Capital Requirements Directive ("CRD") IV, capital resources are designated into two tiers, Tier 1 and Tier 2. Tier 1 capital consists of CET1 and Additional Tier 1 ("AT1"). CET1 is the highest quality of capital and typically represents equity and audited reserves; AT1 usually represents contingent convertible bonds; Tier 2 capital typically consists of subordinated debt and hybrid debt capital instruments.

Tier 1 capital is the primary component of MLI and the Group's Capital Resources. All of MLI and the Group's Tier 1 capital is made up of CET1. Table 1 shows a breakdown of the capital resources of MLI and the Group.

Table 1. Regulatory Capital Resources and Ratios Summary

(Dollars in Millions)	MLI	MLUKCH Group
Common Equity Tier 1 (CET1) capital before regulatory adjustments	36,257	35,489
Total Regulatory Adjustments to Common Equity Tier 1 (CET1)	(1,282)	(1,282)
Common Equity Tier 1 (CET1) Capital	34,975	34,207
Additional Tier 1 (AT1) capital	-	-
Tier 1 Capital (T1 = CET1 + AT1)	34,975	34,207
Tier 2 (T2) Capital	-	800
Total Capital (TC = T1 + T2)	34,975	35,007
Total Risk Weighted Assets	170,495	169,430
Common Equity Tier 1 (as a percentage of risk exposure amount)	20.5%	20.2%
Tier 1 (as a percentage of risk exposure amount)	20.5%	20.2%
Total Capital (as a percentage of risk exposure amount)	20.5%	20.7%

4. Minimum Capital Requirement

MLI and the Group are subject to a Minimum Capital Requirement set out in the CRR (Pillar 1 Capital Requirement). MLI and the Group are also required to hold capital in addition to the Minimum Capital Requirement to meet local PRA obligations and CRD IV buffers (Pillar 2 Capital Requirements).

The Minimum Capital Requirement principally comprises of Credit Risk, Market Risk and Operational Risk requirements.

Table 2. Overview of RWAs and Minimum Capital Requirement

		MLI			MLUKCH Gr	oup
	RW	/As	Minimum capital requirements	RW	/As	Minimum capital requirements
(Dollars in Millions)	Q2 2019	Q1 2019	Q2 2019	Q2 2019	Q1 2019	Q2 2019
Credit risk (excluding CCR)	4,655	4,468	372	4,445	4,265	356
Of which the standardised approach	4,655	4,468	372	4,445	4,265	356
Of which the foundation IRB (FIRB) approach	-	-	-	-	-	-
Of which the advanced IRB (AIRB) approach	-	-	-	-	-	-
Of which equity IRB under the simple risk-weighted approach or the IMA	-	-	-	-	-	-
CCR	116,700	116,790	9,336	116,637	116,729	9,331
Of which mark to market	56,980	59,419	4,558	56,986	59,422	4,559
Of which original exposure	-	-	-	-	-	-
Of which: comprehensive approach for credit risk mitigation (for SFTs)	35,442	34,213	2,835	35,373	34,148	2,830
Of which internal model method (IMM)	-	-	-	-	-	-
Of which risk exposure amount for contributions to the default fund of a CCP	564	499	45	564	499	45
Of which CVA	23,714	22,660	1,897	23,714	22,660	1,897
Settlement risk	311	304	25	311	304	25
Securitisation exposures in the banking book (after the cap)	3,937	4,135	315	3,937	4,135	315
Of which IRB approach	-	-	-	-	-	-
Of which IRB supervisory formula approach (SFA)	-	-	-	-	-	-
Of which internal assessment approach (IAA)	-	-	-	-	-	-
Of which standardised approach	3,937	4,135	315	3,937	4,135	315
Market risk	31,770	32,082	2,542	32,724	33,173	2,618
Of which the standardised approach	18,524	18,565	1,482	19,478	19,656	1,558
Of which IMA	13,247	13,517	1,060	13,247	13,517	1,060
Large exposures	1,588	1,473	127	271	363	22
Operational risk	11,170	11,170	894	11,105	11,105	888
Of which basic indicator approach	-	-	-	-	-	-
Of which standardised approach	11,170	11,170	894	11,105	11,105	888
Of which advanced measurement approach	-	-	-	-	-	-
Amounts below the thresholds for deduction (subject to 250% risk weight)	363	218	29	-	-	-
Floor adjustment	-	-	-	-	-	-
Total	170,495	170,639	13,640	169,430	170,074	13,554

4.1 Key Movements in the Quarter

MLI and the MLUKCH Group's Minimum Capital Requirement remained broadly flat quarter on quarter.

Within the Group, MLI has adopted the standardised approach for calculating Counterparty Risk, Credit Risk and Operational Risk Capital Requirements. In order to adhere to the standardised rules in CRD IV, MLI uses external ratings where available from External Credit Assessment Institutions ("ECAIs") based on a combination of Moody's Investors Service, Inc. ("Moody's"), S&P and Fitch.

The approach used for Market Risk is a combination of models approved by the PRA, including Value at Risk ("VaR") and the standardised approach. The Group applies the standardised approach to all other exposures.

Table 3 presents a breakdown of MLI and the Group's Market Risk under the standardised approach and Table 4 presents a breakdown of MLI's Market Risk under the Internal Model Approach ("IMA"). Table 5 shows a reconciliation of movements in RWAs under the IMA for MLI's Market Risk. Further detail on the components follows the tables.

MLI is the only entity in the Group with an internal model permission for market risk therefore Table 4 is presented for MLI only. Market Risk under the IMA is the same for MLI and the Group.

Table 3. EU MR 1 Market Risk under the Standardised Approach

		Q2 :	2019	
	N	ИLI	MLUKO	H Group
(Dollars in Millions)	RWAs	Capital requirements	RWAs	Capital requirements
Outright products				
Interest rate risk (general and specific)	9,446	756	9,754	780
Equity and Collective Investment Undertakings risk (general and specific)	4,418	353	4,866	389
Foreign exchange risk	1,580	126	1,777	142
Commodity risk	1,763	141	1,763	141
Options				
Simplified approach	-	-	-	-
Delta-plus method	148	12	148	12
Scenario approach	-	-	-	-
Securitisation (specific risk)	1,169	94	1,169	94
Total	18,524	1,482	19,478	1,558

Table 4. EU MR 2-A Market Risk under the IMA

	Q2	2019
(Dollars in Millions)	RWAs	Capital requirements
VaR	1,182	95
Previous day's VaR (Article 365(1) of the CRR (VaRt-1))		25
Average of the daily VaR (Article 365(1)) of the CRR on each of the preceding 60 business days (VaRavg) x multiplication factor (mc) in accordance with Article 366 of the CRR		95
SVaR	2,526	202
Latest SVaR (Article 365(2) of the CRR (SVaRt-1))		79
Average of the SVaR (Article 365(2) of the CRR) during the preceding 60 business days (SVaRavg) x multiplication factor (ms) (Article 366 of the CRR)		202
IRC	2,796	224
Most recent IRC value (incremental default and migration risks calculated in accordance with Article 370 and Article 371 of the CRR)		224
Average of the IRC number over the preceding 12 weeks		179
Comprehensive risk measure	1,572	126
Most recent risk number for the correlation trading portfolio (Article 377 of the CRR)		73
Average of the risk number for the correlation trading portfolio over the preceding 12 weeks		58
8% of the own funds requirement in the standardised approach on the most recent risk number for the correlation trading portfolio (Article 338(4) of the CRR)		126
Other	5,170	414
Total	13,247	1,060

Table 5. EU MR 2-B RWA Flow Statements of Market Risk Exposures under the IMA

				MLI			
(Dollars in Millions)	VaR	SVaR	IRC	CRM	Other	Total RWAs	Total Capital Requirements
RWAs at previous quarter end	1,844	2,918	3,162	1,455	4,138	13,517	1,081
Movement in the risk levels	(662)	(392)	(366)	117	1,032	(271)	(21)
RWAs at the end of the reporting period	1,182	2,526	2,796	1,572	5,170	13,247	1,060

Market risk capital requirements under the IMA decreased during the quarter, mainly driven by reductions in VaR, Stressed VaR and Incremental Risk Charge. This was partly offset by an increase in Risks not in VaR ("RNIVs") in the quarter.

Table 6 shows MLI's maximum, minimum, average and period-end values for regulatory VaR and Stressed VaR, and risk numbers for the IRC and CRM models for the six months to 30 June 2019.

Table 6. MR 3 IMA Values for Trading Portfolios

(Dollars in Millions)	Q2 2019
VaR (10 day 99%)	
Maximum value	81
Average value	41
Minimum value	16
Period end	25
SVaR (10 day 99%)	
Maximum value	163
Average value	73
Minimum value	40
Period end	79
IRC (99.9%)	
Maximum value	314
Average value	216
Minimum value	144
Period end	224
Comprehensive risk capital charge (99.9%)	
Maximum value	73
Average value	52
Minimum value	40
Period end	73

Backtesting

The VaR methodology is evaluated through a daily backtesting process, which compares the daily VaR results, utilizing a one-day holding period, against a comparable subset of trading Profit and Loss ("P&L").

As required by the CRR, backtesting uses the 'Hypothetical' and 'Actual' definitions of the P&L. Hypothetical P&L is the P&L from the move in the value of the portfolio on the current day assuming unchanged positions from the end of the previous day. Actual P&L and Hypothetical P&L exclude fees, commissions and net interest income.

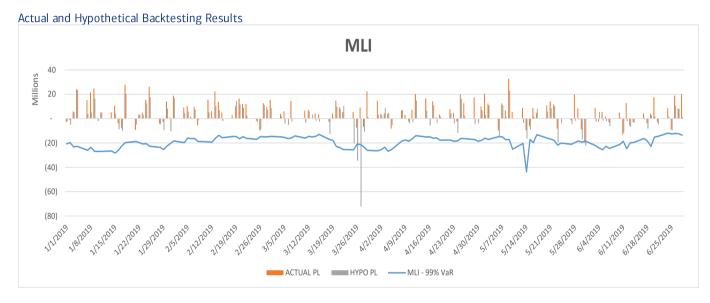
A backtesting overshooting occurs when a trading loss on day N exceeds the VaR value of the portfolio on day N-1. These overshootings are evaluated to understand the positions and market moves that produced the trading loss and to ensure that the VaR methodology accurately represents those losses.

The number of backtesting overshootings observed can differ from the statistically expected number of overshootings for a number of reasons. When this occurs, analysis is done to assess the model's performance.

In the six months ending 30 June 2019, MLI trading losses as measured by hypothetical P&L exceeded the prior day's VaR on three occasions, and as measured by actual P&L exceeded the prior day's VaR on one occasion. The number of overshootings corresponds to the PRA Green zone (fewer than five overshootings).

Two overshootings on hypothetical P&L occurred in March, primarily as a result of increased market volatility in emerging markets rates and FX. One overshooting occurred on both hypothetical and actual P&L on the same date in May, driven by increased market volatility in US Dollar interest rates. The results are illustrated in the chart below.

Figure 2. EU MR 4 Comparison of VaR Estimates with Gains/Losses



The actual and hypothetical P&L shown in the above graph is only for positions covered by the VaR model, and not for the entirely of MLI. The VaR measure shown is for regulatory VaR using a three year look-back period, and one day holding period.

Capital requirements covered by the VaR model (Pillar 1 capital requirements for VaR and Stressed VaR) total 12% of MLI's Pillar 1 capital requirements for market risk, and 2% of MLI's total Pillar 1 capital requirements.

5. Leverage Ratio

The leverage ratio is a measure of Tier 1 capital as a percentage of exposure as defined under the CRR rules.

The requirement for the calculation and reporting of leverage ratios was introduced in 2014 as part of the CRR, and amended by the European Commission Delegated Act (EU) 2015/62 in 2015.

The CRR does not currently include a binding minimum Leverage Ratio requirement. In June 2019, amendments to the CRR were published in the Official Journal of the EU as Regulation (EU) 2019/876. These amendments included a binding minimum Leverage Ratio requirement of 3%, as well as a number of changes to the calculation of the exposure measure. These amendments apply from 28th June 2021. MLI's and the Group's leverage ratios are in excess of the incoming minimum requirement at 8.0% and 8.0% respectively, calculated based on the current CRR exposure measure.

Table 7. Leverage Ratio Summary

(Dollars in Millions)	MLI	MLUKCH Group
Tier 1 Capital	34,975	34,207
Total Leverage Ratio Exposures	434,882	430,261
Leverage Ratio	8.0%	8.0%

6. Liquidity Coverage Ratio ("LCR") Disclosures

The MLUKCH Group is subject to the LCR, which requires the Group to hold a sufficient buffer of eligible High Quality Liquid Assets ("HQLA") to cover potential cash outflows during the first 30 days of a liquidity stress event.

Table 8 discloses average weighted values of the liquidity buffer, total net cash outflows and the LCR of MLI and of the MLUKCH Group.

Table 8. Simplified LCR Disclosure

		N	1LI	
(Dollars in Millions)		Total weighted	value (average)	
Quarter ending on	30-Sep-18	31-Dec-18	31-Mar-19	30-Jun-19
Number of data points used in the calculation of averages	12	12	12	12
Liquidity Buffer	26,473	26,424	27,304	28,293
Total Net Cash Outflows	13,758	12,841	12,260	12,226
Liquidity Coverage Ratio (%)	195%	211%	225%	233%

		MLUKC	l Group	
(Dollars in Millions)		Total weighted	value (average)	
Quarter ending on	30-Sep-18	31-Dec-18	31-Mar-19	30-Jun-19
Number of data points used in the calculation of averages	12	12	12	12
Liquidity Buffer	26,473	26,424	27,304	28,293
Total Net Cash Outflows	13,755	12,835	12,248	12,205
Liquidity Coverage Ratio (%)	195%	211%	226%	234%

Note: The disclosed values and figures within the liquidity buffer, total net cash outflows, and LCR are simple averages of the preceding twelve LCR monthly reporting observations for each quarter.

7. Additional Detail on Capital Resources and Leverage

7.1 Additional Detail on Capital Resources

The below table shows a reconciliation between the accounting balance sheet values and the regulatory capital values of the items included in MLI's and the Group's capital resources. Further details on the composition of MLI's and the Group's capital resources are shown in tables 10, 11 and 12.

Table 9. Regulatory Capital Resources and Reconciliation to Unaudited Balance Sheet as at 30 June 2018

	Q2 :	2019
(Dollars in Millions)	MLI	MLUKCH Group
Ordinary Share Capital	7,933	2,926
Share Premium	4,499	-
Other Reserves	9,193	1,082
Profit and Loss Account	13,816	30,666
Profit and Loss Account (Accounting Balance Sheet Value)	14,709	31,537
Debit Valuation Adjustment	(181)	(181)
Prudential Valuation Adjustment	(633)	(633)
Current Year Unaudited Profit	(74)	(53)
Other Current Year Unaudited (Gains) / Losses	(3)	(3)
Tier 1 Capital Before Deductions	35,442	34,674
Deferred Tax Asset	(270)	(270)
Defined Benefit Pension Fund Asset (net of associated deferred tax liability)	(197)	(197)
Tier 1 Capital	34,975	34,207
Subordinated Liabilities (After Regulatory Adjustments)	-	800
Subordinated Liabilities (Accounting Balance Sheet Value)	-	800
Amortisation and Other Adjustments	-	-
Tier 2 Capital	-	800
Total Capital Resources (net of deductions)	34,975	35,007

Table 10. MLUKCH Group Capital Instrument Features

		MLUKCH Group		
Capita	I Instruments Main Features	CET1	AT1	T2
1	Issuer	ML UK Capital Holdings	N/a	ML UK Capital Holdings
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Private Placement	N/a	Private Placement
3	Governing law(s) of the instrument	English	N/a	English
Regulat	ory Treatment			
4	Transitional CRR rules	CET1	N/a	T2
5	Post-transitional CRR rules	CET1	N/a	T2
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Consolidated	N/a	Consolidated
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares with full voting rights	N/a	Subordinated Loan
8	Amount recognised in regulatory capital (currency in million, as of most recent reporting date)	\$2,926m comprising nominal and premium	N/a	USD 800m
9	Nominal amount of instrument	\$1.00	N/a	USD 800m
9a	Issue price	\$1.00 30 Dec 2015	N/a	USD 800m
9b	Redemption price	N/a	N/a	N/a
10	Accounting classification	Shareholders equity	N/a	Liability - amortised
11	Original date of issuance	30-Dec-15	N/a	27-Nov-15
12	Perpetual or dated	Perpetual	N/a	Dated
13	Original maturity date	No maturity	N/a	27-Nov-26
14	Issuer call subject to prior supervisory approval	No	N/a	No
15	Optional call date, contingent call dates and redemption amount	N/a	N/a	No issuer call date. However, may repay whole or in part at p on any date if a Regulatory Event or Tax Event occurs, subject to prior
16	Subsequent call dates, if applicable	N/a	N/a	supervisory approval
	Subsequent call dates, if applicable	N/a	N/a	
		N/a	N/a	supervisory approval
Coupon	s / Dividends			supervisory approval N/a
Coupon 17	s / Dividends Fixed or floating dividend/coupon	N/a	N/a	supervisory approval N/a Floating 1month USD LIBOR plus 227 bps per
17 18	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index	N/a N/a	N/a N/a	supervisory approval N/a Floating 1month USD LIBOR plus 227 bps per annum
17 18 19	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper	N/a N/a No	N/a N/a N/a	supervisory approval N/a Floating 1month USD LIBOR plus 227 bps per annum No
17 18 19 20a	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/a N/a No Fully discretionary	N/a N/a N/a N/a	supervisory approval N/a Floating 1month USD LIBOR plus 227 bps per annum No Mandatory
17 18 19 20a 20b	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/a N/a No Fully discretionary Fully discretionary	N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating 1 month USD LIBOR plus 227 bps per annum No Mandatory Mandatory
17 18 19 20a 20b 21	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem	N/a No Fully discretionary No	N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating 1 month USD LIBOR plus 227 bps per annum No Mandatory Mandatory No
17 18 19 20a 20b 21 22	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative	N/a N/a N/a N/a N/a N/a N/a	supervisory approval. N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative
17 18 19 20a 20b 21 22 23	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible	N/a N/a N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible
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17 18 19 20a 20b 21 22 23 24 25	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially	N/a N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible N/a N/a
17 18 19 20a 20b 21 22 23 24 25 26	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into	N/a N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible N/a N/a N/a
19 20a 20b 21 22 23 24 25 26 27	S / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, conversion rate If convertible, mandatory or optional conversion	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory Mo Cumulative No- Cumulative N/a N/a N/a N/a N/a N/a N/a
19 20a 20b 21 22 23 24 25 26 27	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into	N/a N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory Mo Cumulative Non Cumulative Non-convertible N/a N/a N/a N/a N/a N/a
19 20a 20b 21 22 23 24 25 26 27 28 29	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, amodatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into	N/a N/a No Fully discretionary Fully discretionary No Non-convertible N/a N/a N/a N/a N/a N/a N/a N/a	N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible N/a N/a N/a N/a N/a N/a N/a N/a N/a
19 20a 20b 21 22 23 24 25 26 27 28 29 30	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, to partially If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a	N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory Mon-convertible N/a
19 20a 20b 21 22 23 24 25 26 27 28 29 30 31	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, promersion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Wirte-down features If write-down, write-down trigger(s)	N/a N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a	N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bp per annum No Mandatory Mandatory Mo Cumulative Non Cumulative Non-convertible N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, expectify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features If write-down, write-down trigger(s) If write-down, full or partially If write-down, full or partial	N/a N/a No Fully discretionary Fully discretionary No Non-convertible N/a	N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33 34 35	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, conversion rate If convertible, expectify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If write-down features If write-down, write-down trigger(s) If write-down, full or partial If surite-down in subordination hierarchy in liquidation (specify instrument type immediately senio to instrument)	N/a N/a N/a Fully discretionary Fully discretionary No Non-convertible N/a	N/a	supervisory approval N/a Floating Imonth USD LIBOR plus 227 bp per annum No Mandatory Mandatory No Cumulative Non-convertible N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33 34	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features If write-down, full or partial If write-down, full or partial If write-down, pull or partial If unite-down is usbordination hierarchy in liquidation (specify instrument type immediately senio	N/a N/a No Fully discretionary Fully discretionary No Non-convertible N/a	N/a	supervisory approval. N/a Floating 1month USD LIBOR plus 227 bps per annum No Mandatory Mandatory No Cumulative Non-convertible N/a

Table 11. MLI Capital Instrument Features

		MLI		
apita	l Instruments Main Features	CET1	AT1	T2
1	Issuer	Memill Lynch	N/a	N/a
		International		
2	Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	Private Placement	N/a	N/a
3	Governing law(s) of the instrument	English	N/a	N/a
gulat	ory Treatment			
4	Transitional CRR rules	CET1	N/a	N/a
5	Post-transitional CRR rules	CET1	N/a	N/a
6	Eligible at solo/(sub-)consolidated/ solo & (sub-)consolidated	Solo	N/a	N/a
7	Instrument type (types to be specified by each jurisdiction)	Ordinary shares with	N/a	N/a
		full voting rights		
8	Amount recognised in regulatory capital (currency in million, as of most recent reporting	\$12,432m comprising	N/a	N/a
	date)	nominal and premium		
9	Nominal amount of instrument	\$1.00	N/a	N/a
9a	Issue price	\$1.00 19 Dec 2012	N/a	N/a
		\$4.76 18 Nov 2014		
9b	Redemption price	N/a	N/a	N/a
10	Accounting classification	Shareholders equity	N/a	N/a
10	Accounting classification	Snarenoiders equity	14/0	IN/d
11	Original date of issuance	\$6.735m 19 Dec 2012	N/a	N/a
	ongina date of issuance	\$1,198m 18 Nov 2014		140 G
12	Perpetual or dated	Perpetual	N/a	N/a
13	Original maturity date	No maturity	N/a	N/a
14	Issuer call subject to prior supervisory approval	No	N/a	N/a
15	Optional call date, contingent call dates and redemption amount	N/a	N/a	N/a
16	Subcoquent call dates if applicable	N/a	N/a	N/a
16	Subsequent call dates, if applicable	N/a	N/a	N/a
upon	s / Dividends			
upon 17	s / Dividends Fixed or floating dividend/coupon	N/a	N/a	N/a
upon	s / Dividends			
upon 17	s / Dividends Fixed or floating dividend/coupon	N/a	N/a	N/a
upon 17	s / Dividends Fixed or floating dividend/coupon	N/a	N/a	N/a
17 18 19	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index	N/a N/a	N/a N/a	N/a N/a
17 18 19 20a	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper	N/a N/a No	N/a N/a N/a	N/a N/a N/a
17 18 19 20a	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing)	N/a N/a No Fully discretionary	N/a N/a N/a N/a	N/a N/a N/a N/a N/a
17 18 19 20a 20b	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount)	N/a N/a No Fully discretionary Fully discretionary	N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem	N/a N/a No Fully discretionary No	N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative	N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible	N/a N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23 24	S / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s)	N/a N/a No Fully discretionary No Non-cumulative Non-convertible N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23 24 25	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23 24 25 26	S / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trate If convertible, conversion rate If convertible, mandatory or optional conversion	N/a N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a	N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23 24 25 26 27	s / Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, conversion rate	N/a N/a No Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a N/a	N/a	N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28	Sr Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, conversion rate If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a N/a N/a N/a N/a N/a N/a N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a	N/a
19 19 20a 20b 21 22 23 24 25 26 27 28 29	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, to partially If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features	N/a N/a No Fully discretionary Fully discretionary No Non-convertible N/a N/a N/a N/a N/a N/a N/a N/a	N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28 29 30	Sr Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, conversion rate If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into	N/a N/a No Fully discretionary No Non-convertible N/a	N/a	N/a N/a N/a N/a N/a N/a N/a N/a N/a N/a
19 20a 20b 21 22 23 24 25 26 27 28 29 30 31	Sr Dividends Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion rate If convertible, expecify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features If write-down, write-down trigger(s) If write-down, full or partiall	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a	N/a	N/a
17 18 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, expression trigger(s) If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument it converts into Write-down features If write-down, full or partial If write-down, full or partial If write-down, permanent or temporary	N/a N/a No Fully discretionary No Non-convertible N/a	N/a	N/a
19 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33 34	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, fully or partially If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument it converts into Write-down features If write-down, vrite-down trigger(s) If write-down, permanent or temporary If temporary write-down, description of write-up mechanism	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a	N/a	N/a
19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, expression trigger(s) If convertible, specify instrument type convertible into If convertible, specify instrument type convertible into If convertible, specify instrument it converts into Write-down features If write-down, full or partial If write-down, full or partial If write-down, permanent or temporary	N/a N/a No Fully discretionary Fully discretionary No Non-cumulative Non-convertible N/a	N/a	N/a
19 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33 34	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features If write-down, write-down trigger(s) If write-down, full or partial If write-down, full or partial If write-down, full or partial If the write-down, full or partial If the progray write-down, description of write-up mechanism Position in subordination hierarchy in liquidation (specify instrument type immediately senio	N/a N/a No Fully discretionary Fully discretionary No Non-convertible N/a	N/a	N/a
19 19 20a 20b 21 22 23 24 25 26 27 28 29 30 31 32 33 34	Fixed or floating dividend/coupon Coupon rate and any related index Existence of a dividend stopper Fully discretionary, partially discretionary or mandatory (in terms of timing) Fully discretionary, partially discretionary or mandatory (in terms of amount) Existence of step up or other incentive to redeem Noncumulative or cumulative Convertible or non-convertible If convertible, conversion trigger(s) If convertible, conversion trigger(s) If convertible, conversion rate If convertible, mandatory or optional conversion If convertible, specify instrument type convertible into If convertible, specify issuer of instrument it converts into Write-down features If write-down, write-down trigger(s) If write-down, full or partial If write-down, full or partial If write-down, full or partial If the write-down, full or partial If the progray write-down, description of write-up mechanism Position in subordination hierarchy in liquidation (specify instrument type immediately senio	N/a N/a N/a No Fully discretionary No Non-convertible N/a	N/a	N/a

Table 12. Own Funds Disclosure Template (Dollars in Millions) (1)

	Amount at D	isclosure Date
Own Funds Disclosure Template	MLI	MLUKCH
Capital instruments and the related share premium accounts	12,432	Group 2,926
of which: Ordinary shares with full voting rights	12,432	2,926
Retained earnings	14,818	31,667
Accumulated other comprehensive income (and other reserves, to include unrealised gains and losses under the applicable accounting standards)	9,006	896
Common Equity Tier 1 (CET1) capital before regulatory adjustments	36,257	35,489
Common Equity Tier 1 (CET1) Capital: Regulatory Adjustments		
Prudential valuation adjustment	(633)	(633)
Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Article 38 (3) are met) (negative amount)	(57)	(57)
Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	(181)	(181)
Defined-benefit pension fund assets (negative amount)	(197)	(197)
Deferred tax assets arising from temporary differences	(213)	(213)
Total Regulatory Adjustments to Common Equity Tier 1 (CET1)	(1,282)	(1,282)
Common Equity Tier 1 (CET1) Capital	34,975	34,207
Additional Tier 1 (AT1) capital: Instruments	-	-
Tier 1 Capital (T1 = CET1 + AT1)	34,975	34,207
Fier 2 (T2) Capital: Instruments and Provisions	<u> </u>	<u> </u>
Capital instruments and the related share premium accounts	-	800
Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	-	-
Tier 2 (T2) Capital	-	800
Fotal Capital (TC = T1 + T2)	34,975	35,007
Total Risk Weighted Assets	170,495	169,430
Capital Ratios and Buffers	., 0, 133	103,130
Common Equity Tier 1 (as a percentage of risk exposure amount)	20.5%	20.2%
Fier 1 (as a percentage of risk exposure amount)	20.5%	20.2%
Fotal Capital (as a percentage of risk exposure amount)	20.5%	20.7%
Institution specific buffer requirement (CET1 requirement in accordance with article 92 (1) (a) plus capital conservation and countercyclical buffer requirements, plus systemic risk buffer, plus the systemically important institution buffer (G-SII or 0-SII buffer), expressed as a percentage of risk exposure amount)	7.2%	7.2%
of which: capital conservation buffer requirement	2.5%	2.5%
of which: countercyclical buffer requirement	0.2%	0.2%
Common Equity Tier 1 available to meet buffers (as a percentage of risk exposure amount)	12.5%	12.7%
Amounts below the thresholds for deduction (before risk weighting)		
Direct, indirect and synthetic holdings of the capital of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	1,811	1,811
Direct, indirect and synthetic holdings by the institution of the CET 1 instruments of financial sector entities where the insti-tution has a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	145	-
Applicable caps on the Inclusion of provisions In Tier 2		
Credit risk adjustments included in T2 in respect of exposures subject to standardized approach (prior to the application of the cap)	-	-

⁽¹⁾ There are no own funds items or adjustments that are subject to pre-regulation (EU) No 575 / 2013 treatment or prescribed residual amount of regulation (EU) No 575 / 2013 in MLI or the Group.

7.2 Additional Detail on Leverage Ratio

Leverage Approach

The leverage ratio for a quarter end is calculated using regulatory capital and on / off balance sheet figures at a point in time. The measure of Tier 1 capital used in the computation of MLI's and the Group's ratio is the same under both transitional and fully phased in definitions of Tier 1 capital per CRD IV.

The leverage ratio is monitored in line with regulatory requirements. Exposure is typically managed through a combination of mechanisms including risk appetite limits, collateralisation and netting arrangements. Tables 13, 14 and 15 below give detailed disclosure of the elements included in the leverage ratio calculation.

Table 13. Summary Reconciliation of Accounting Assets and Leverage Ratio Exposures (1)

(Dollars in Millions)	MLI
Total Assets as per Balance Sheet	420,028
Adjustments for Derivative Financial Instruments	(13,241)
Adjustments for Securities Financing Transactions	24,398
Adjustment for Off-Balance Sheet Items (ie conversion to credit equivalent amounts of off-balance sheet exposures)	2,427
Other Adjustments	1,270
Leverage Ratio Exposure	434,882

⁽¹⁾ In accordance with article 4(2) of Regulation (EU) 2016/200 on the disclosure of leverage ratio, this table is not disclosed for the Group as the Group does not publish financial statements at the consolidated level.

Table 14. Leverage Ratio Common Disclosure

	MLI	MLUKCH
(Dollars in Millions)		Group
On-Balance Sheet Exposures (excluding derivatives and SFTs)		
On-balance Sheet Items (excluding Derivatives, SFTs and fiduciary assets, but including Collateral)	155,879	151,142
Asset Amounts Deducted in Determining Tier 1 Capital	(1,100)	(1,100)
Total On-Balance Sheet Exposures (excluding derivatives, SFTs and fiduciary assets)	154,778	150,042
Derivative Exposures		
Replacement Cost Associated with Derivatives Transactions (net of Eligible Cash Variation Margin)	16,767	16,831
Add-on Amounts for PFE Associated with Derivatives Transactions (Mark-to-Market method)	122,247	122,522
Gross-up for Derivatives Collateral provided where deducted from the Balance Sheet Assets pursuant to the Applicable Accounting Framework	-	-
(Deductions of Receivables Assets for Cash Variation Margin provided in Derivatives Transactions)	(33,764)	(33,764)
(Exempted CCP leg of Client-Cleared Trade Exposures)	(6,770)	(6,770)
Adjusted Effective Notional Amount of Written Credit Derivatives	214,409	214,409
(Adjusted Effective Notional Offsets and Add-On Deductions for Written Credit Derivatives)	(167,699)	(167,699)
Total Derivative Exposure	145,191	145,530
Securities Financing Transaction Exposures		
Gross SFT Assets (With No Recognition of Netting), after Adjusting for Sales Accounting Transactions	209,559	209,559
(Netted Amounts of Cash Payables and Cash Receivables of Gross SFT Assets)	(96,925)	(96,925)
Counterparty Credit Risk Exposure for SFT Assets	19,852	19,784
Total Securities Financing Transaction Exposures	132,486	132,418
Off-Balance Sheet Exposures		
Off-balance Sheet Exposures at Gross Notional Amount	7,905	6,356
Adjustments for Conversion to Credit Equivalent Amounts	(5,478)	(4,084)
Total Off-Balance Sheet Exposures	2,427	2,272
Capital and Total Exposures		
Tier 1 Capital	34,975	34,207
Total Leverage Ratio Exposures	434,882	430,261
Leverage Ratio		
Leverage Ratio	8.0%	8.0%
-cvcrage natio	0.070	0.070

Table 15. Split of On-Balance Sheet Exposures (excluding derivatives, SFTs and exempted exposures)

(Dollars in Millions)	MLI	MLUKCH Group
Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:	118,928	114,191
Trading Book Exposures	88,681	88,644
Banking Book Exposures, of which:	30,247	25,547
Exposures treated as Sovereigns	9,878	9,878
Exposures to Regional Governments, MDB, International Organisations and PSE not treated as Sovereigns	908	908
Institutions	3,915	3,915
Secured by Mortgages of Immovable Properties	3	3
Corporate	13,859	9,237
Exposures in Default	8	8
Other Exposures (Eg Equity, Securitisations, and other Non-Credit Obligation Assets)	1,676	1,597

7.3 Additional Detail on Minimum Requirements for Own Funds & Eligible Liabilities

As part of amendments to the CRR which were published in the Official Journal of the EU as Regulation (EU) 2019/876, the international standard to meet a minimum amount of Total Loss Absorbing Capacity ("TLAC") became effective for certain types of Investment Firms and Credit Institutions in June 2019. In the CRR this is referred to as Minimum Requirements for Own Funds & Eligible Liabilities ("MREL").

Firms that are material subsidiaries of a non-EU Global Systemically Important Institution ("G-SII") per the CRR definition are required to hold a minimum amount of MREL. BAC is a non-EU G-SII and MLI and the MLUKCH Group meet the definition of material subsidiary, and are therefore subject to this requirement.

MREL resources are comprised of qualifying capital resources and eligible liabilities. In order for liabilities that are not capital resources to qualify as eligible, they must meet certain criteria such as having a minimum residual maturity of at least one year, and being subordinated to other operating liabilities.

MLI and MLUKCH have not issued any eligible liabilities, and therefore total MREL resources is equal to Tier 1 capital. Table 16 shows MLI and MLUKCH's key metrics relating to MREL requirements.

Table 16. Key metrics - MREL Requirements

	Q2 2019		
(Dollars in Millions)	MLI	MLUKCH Group	
Total MREL Resources Available	34,975	34,207	
Total RWA	170,495	169,430	
MREL as a percentage of RWA	20.5%	20.2%	
Leverage Ratio Exposure Measure	434,882	430,261	
MREL as a percentage of Leverage Ratio Exposure Measure	8.0%	8.0%	
Excluded Liabilities	360,863	356,422	

Appendix - Supplementary Disclosure Templates

Table 17. EU CR1-A Credit quality of Exposures by Exposure Class and Instrument

	Jun-19							
	Gross carryin		Specific credit risk	General credit risk		Credit risk adjustment		
(Dollars in Millions)	Defaulted exposures	Non-defaulted exposures	adjustment	adjustment	Accumulated write-offs	charges of the period	Net values	
Central governments or central banks	2	9,872	-	-	-	-	9,875	
Institutions	2	6,065	-	-	-	-	6,067	
Corporates	2	19,941	-	-		-	19,943	
Claims on institutions and corporate with a short-term credit assessment	-	884	-	-	-	-	884	
Other exposures	1	1,430	-	-	-	-	1,431	
Exposures in default (1)	8	-	=	-	-	-	8	
Total	8	38,192	-	-	-	-	38,200	
of which: Loans	1	5,240	-	-	-	-	5,241	
of which: Debt Securities	7	5,762	-	-	-	-	5,769	
of which: Off-balance-sheet exposures	-	8,995	-	-	-	-	8,995	

⁽¹⁾ In line with EBA guidance, Defaulted exposures are shown both as "Exposures in Default" and in the Exposure Class that corresponded to the exposure before default. Any duplication is not included in the "Total" row

Table 18. EU CR1-B Credit Quality of Exposures by Industry or Counterparty Types

	Jun-19								
	Gross carryin	g values of	G	Consultant to		Conflicted of second			
	Defaulted exposures	Non-defaulted	Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Credit risk adjustment charges of the period	Net values		
(Dollars in Millions)		exposures							
Bank	1	4,811	-	-	-	-	4,812		
Broker Dealer	0	4,833	-	-	-	-	4,833		
Other Financial	2	17,263	-	-	-	-	17,265		
Sovereign & Government Related	3	10,763	-	-	-	-	10,766		
Other (1)	2	522	-	-	-	-	524		
Total	8	38,192	-	-	-	-	38,200		

⁽¹⁾ Industry classification of "Other" comprises of, Energy & Commodities, Industrial & Commercial, Insurance and Central Counterparties

Table 19. EU CR1-C Credit Quality of Exposures by Geography

				Jun-19				
	Gross carryin	Gross carrying values of		6 1 19.11				
(Dollars in Millions)	Defaulted exposures	Non-defaulted exposures	Specific credit risk adjustment	General credit risk adjustment	Accumulated write-offs	Credit risk adjustment charges of the period	Net values	
EMEA	2	22,521	-	-	-	-	22,523	
United Kingdom	0	13,047	-	-	-	-	13,047	
Luxembourg	-	2,183	-	-	-	-	2,183	
Belgium	-	1,862	-	-	-	-	1,862	
France	-	1,251	-	-	-	-	1,251	
Saudi Arabia	-	1,087	-	-	-	-	1,087	
Other EMEA Countries (1)	1	3,091	-	-	-	-	3,093	
Americas	4	12,246	-	-	-	-	12,250	
Curacao	=	7,209	-	-	-	=	7,209	
United States Of America	2	4,483	-	-	-		4,484	
Other Americas Countries (1)	3	554	-	-	-	-	557	
Asia	2	2,534	-	-	-	-	2,536	
Japan	2	1,638	-	-	-	-	1,640	
Other Asia Countries	0	896	-	-	-	=	896	
Other Geographical Areas (2)	•	890	-	-	-	-	890	
Total	8	38,192	-	-	-	-	38,200	

⁽¹⁾ Only countries which have exposures greater than \$1bn have been disclosed separately. Other countries within a given region have been aggregated together as "Other Countries".

^{(2) &}quot;Other Geographical Areas" comprises of exposures to Multilateral Development Banks and International Organisations.

No template for EU CR1-D Ageing of Past-Due Exposures is included in this document because there are no balances past due to disclose.

Table 20. EU CR1-E Non-Performing and Forborne Exposures

							Jun-19						
		Gross car	oss carrying amount of performing and non-performing exposures				Accumulated impairment and provisions and negative fair value adjustments due to credit risk				Collateral and financial guarantees received		
		Of which performing but			Of which non-performing		On performing exposures		On non-performing exposures		On non-	Of which forborne	
(Dollars in Millions)	past due > 30 days and <= 90 days	= 90 forborne		Of which defaulted	Of which impaired	Of which forborne		Of which forborne		Of which forborne	performing exposures	exposures	
Loans	5,241	-		1	1		-	-	-		-		
Debt Securities	5,769	-	-	7	7	-	-	-	-	-	-	-	-
Off-balance-sheet exposures	8,995	-	-	-	-	-	-	-	-	-	-	-	-

No template for EU CR2-A Changes in Stock of General and Specific Credit Risk Adjustment is included in the document because there are no credit risk adjustments to disclose.

Table 21. EU CR2-B Changes in the Stock of Defaulted and Impaired Loans and Debt Securities

	Jun-19
(Dollars in Millions)	Gross carrying value defaulted exposures
Opening balance	11
Loans and debt securities that have defaulted or impaired since the last reporting period	-
Returned to non-defaulted status	-
Amounts written off	-
Other changes	(3)
Closing balance	8

Table 22. EU CR3 CRM Techniques - Overview

		Jun-19						
(Dollars in Millions)	Exposures unsecured – Carrying amount	Exposures to be secured	Exposures secured by collateral	Exposures secured by financial guarantees	Exposures secured by credit derivatives			
Total loans	847	-	4,394	-	-			
Total debt securities	5,769	-	-	-	-			
Total exposures	6,617	-	4,394	-	-			
Of which defaulted	8	-	-	-	-			

Table 23. EU CR4 Standardised approach – Credit Risk Exposure and CRM Effects

	Jun-19						
	Exposures befor	e CCF and CRM	Exposures pos	t CCF and CRM	RWAs and RW	A density	
(Dollars in Millions)	On-balance-sheet amount	Off-balance-sheet amount	On-balance-sheet amount	Off-balance-sheet amount	RWAs	RWA density	
Central governments or central banks	9,872	-	9,872	-	267	3%	
Regional governments or local authorities	0	-	0	-	0	100%	
Public sector entities	-	-	-	-	-	0%	
Multilateral development banks	180	-	180	-	-	0%	
International organisations	710	-	710	-	-	0%	
Institutions	3,593	2,472	3,593	117	1,086	29%	
Corporates	13,605	6,336	2,062	314	2,376	100%	
Retail	-	-	-	-	-	0%	
Secured by mortgages on immovable property	3	-	3	-	3	100%	
Exposures in default	8	-	8	-	11	150%	
Items associated with particularly high risk	208	-	208	-	312	150%	
Covered bonds	-	-	-	-	-	0%	
Claims on institutions and corporate with a short-term credit assessment	874	10	874	-	446	51%	
Collective investments undertakings	-	-	-	-	-	0%	
Equity exposures	145	-	145	-	363	250%	
Other Items	5	177	5	177	154	84%	
Total	29,204	8,995	17,661	609	5,019	27%	

Table 24. EU CR5 Standardised Approach

	Jun-19																	
	Risk Weight							Total	Of which									
(Dollars in Millions)	0%	2%	4%	10%	20%	35%	50%	70%	75%	100%	150%	250%	370%	1250%	Others	Deducted	10001	unrated
Central governments or central banks	8,543	-	-	-	1,328	-	-	-	-	1	-	-	-	-	-	-	9,872	-
Regional governments or local authorities	-	-	-	-	-	-	-	-	-	0	-	-	-	-	-	-	0	0
Public sector entities	-	-	-	-	-	-	-	-	-	-	-		-	-	-	-	-	-
Multilateral development banks	180	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	180	-
International organisations	710	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	710	-
Institutions	-	-	-	-	3,134	-	245	-	-	331	-	-	-	0	-	-	3,710	409
Corporates	-	-	-	-	3	-	0	-	-	2,368	4	-	-	-	-	-	2,376	2,340
Retail	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Secured by mortgages on immovable property	-	-				-				3	-				-		3	3
Exposures in default	-	-	-	-	-	-	-	-	-	-	8	-	-	-	-	-	8	8
Items associated with particularly high risk	-	-				-					208				-		208	208
Covered bonds	-	-									-				-			
Claims on institutions and corporate with a short-term credit assessment	-	-	-	-	-	-	864	-	-	3	8	-	-	-	-	-	874	-
Collective investments undertakings																		
Equity exposures	-	-	-	-	-	-	-		-	-	-	145		-		-	145	145
Other Items	-	-	-	-	41	-	3	-	-	125	13	-	-	-	-	-	183	183
Total	9,433	-	-	-	4,507	-	1,112	-	-	2,831	240	145	-	0	-	-	18,270	3,297

Table 25. EU CCR1 Analysis of CCR Exposure by Approach

				Jun-19			
(Dollars in Millions)	Notional	Replacement Cost/Current market value	Potential future credit exposure	EEPE	Multiplier	EAD post CRM	RWAs
Mark to market		12,640	182,221			89,771	57,309
Original exposure	n/a					n/a	n/a
Standardised approach		n/a		n/a	n/a	n/a	n/a
IMM (for derivatives & SFTs)				n/a	n/a	n/a	n/a
Financial collateral simple method (for SFTs)						n/a	n/a
Financial collateral comprehensive method (for SFTs)						50,208	35,360
VaR for SFTs						n/a	n/a
Total							92,669

Table 26: EU CCR2 – CVA Capital Charge

	Jun-	·19
(Dollars in Millions)	Exposure value	RWAs
Total portfolios subject to the advanced method	-	-
(i) VaR component (including the 3× multiplier)	-	-
(ii) SVaR component (including the 3× multiplier)	-	-
All portfolios subject to the standardised method	64,127	23,714
Based on the original exposure method	-	-
Total subject to the CVA capital charge	64,127	23,714

Table 27: EU CCR8 – Exposures to CCPs

	Jun	-19
(Dollars in Millions)	EAD post CRM	RWAs
Exposures to QCCPs (total)		1,526
Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which	41,348	827
(i) OTC derivatives	23,610	472
(ii) Exchange-traded derivatives	13,685	274
(iii) SFTs	4,054	81
(iv) Netting sets where cross-product netting has been approved	-	-
Segregated initial margin	-	
Non-segregated initial margin	6,761	135
Prefunded default fund contributions	933	564
Alternative calculation of own funds requirements for exposures		8,273
Exposures to non-QCCPs (total)		-

Table 28. EU CCR3 Standardised Approach – CCR Exposures by Regulatory Portfolio and Risk

	Jun-19												
						Risk Weight						Total	Of which
(Dollars in Millions)	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	rotar	unrated
Central governments or central banks	3,581	-	-	-	65	3	-	-	4,069	-	-	7,718	5,595
Regional governments or local authorities	-	-	-	-	94	-	-	-	206	-	-	301	298
Public sector entities	-	=	-	=	814	-	-	-	35	-	-	849	845
Multilateral development banks	589	-	-	-	2	-	-	-	-	-	-	591	0
International organisations	109	-	-	-	-	-	-	-	-	-	-	109	108
Institutions	-	48,110	-	-	18,386	25,177	-	-	537	18	-	92,226	54,410
Corporates	-	-	-	-	1,509	3,193	-	-	51,587	182	-	56,472	48,262
Retail	-	=	-	=	-	-	-	-	-	-	-	-	-
Claims on institutions and corporate with a short-term credit assessment	-	-	-	-	1,001	25,872	-	-	2,008	814	-	29,695	-
Other Items	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	4,279	48,110	-	-	21,871	54,245	-	-	58,442	1,014	-	187,960	109,519

Table 29. EU CCR5-A Impact of Netting and Collateral Held on Exposure Values

				Jun-19			
	Gross positive fair value	Netting	benefits	Netted current credit	Collate	Net credit exposure	
(Dollars in Millions)	or net carrying amount	Applied	Not Applied	exposure	Used	Not Used	
Derivatives	182,911	(149,299)	(387)	33,618	(24,495)	(24,392)	9,117
SFTs	586,494	(565,221)	(3,804)	21,273	-	(17,924)	21,273
Total	769,405	(714,520)	(4,191)	54,891	(24,495)	(42,316)	30,390

These values can differ from the accounting balance sheet for example, due to differences in netting and off balance sheet items.

Table 30. EU CCR5-B Composition of Collateral for Exposures to CCR

	Jun-19								
	Collateral used in de	erivative transactions	Collateral used in SFTs						
(Dollars in Millions)	Fair Value of collateral received	Fair Value of collateral posted	Fair Value of collateral received	Fair Value of collateral posted					
Cash	37,283	40,690	253,617	267,784					
Non Cash	15,191	9,479	385,010	318,710					
Total	52,474	50,169	638,627	586,494					

Table 31. EU CCR6 Credit Derivatives Exposures

	Jun-19				
	Credit deriva				
(Dollars in Millions)	Protection bought	Protection sold	Other credit derivatives		
Notionals					
Single-name credit default swaps	10,736	7,246	147,758		
Index credit default swaps	2,519	1,059	236,359		
Other credit derivatives	284	-	48,149		
Total Notional	13,539	8,304	432,266		
Fair Values	-	-	-		
Positive fair value (asset)	933	45	5,409		
Negative fair value (liability)	(126)	(467)	(5,564)		