

Risk Management Report



Banco Sumitomo Mitsui Brasileiro S/A

As of March 31st, 2019

SUMMARY

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1. INTRODUCTION

The focus and concern with risk management have been intensifying over the past years, and it is perceived the need for financial institutions to have an increasingly robust and transparent strategy, able to identify, assess and manage risks.

Banco Sumitomo Mitsui Brasileiro S/A ("SMBCB") believes that risk management is essential to promoting stability in financial institutions and that adopting a transparency attitude when disclosing information in regards to this activity strengthens the Institution, contributing to the solidity of the financial system.

This report aims to provide access to information about the risk management structure of the Group, management practices and control of the major risks to which it is exposed, considering the adequacy of capital as well.

2. CORPORATE PROFILE

SMBCB's target market is the segment "corporate" for large enterprises and Japanese companies, in regards to extension of credit, however, in some business segments it is related to smaller sized companies.

3. CORPORATE GOVERNANCE

The Corporate Governance relies on the participation of all hierarchical levels, and aims to optimize the performance of the Institution. This process involves the participation of all layers contemplated by the scope of Corporate Governance, which comprises the Management and the various areas of business, operations, products and services.

The Institution's Management approves the Strategy Plan, new products and services in SMBCB, its annual budget, defines its targeted customers, examines and decides about the events and issues affecting SMBCB's image and its position on national and international market, participates in various committees of the institution, as well is responsible for the information disclosed on this report.

To guarantee the implementation of existing policies and guidelines in force, several committees have been established:

3.1. Management Committee

- Approves the SMBCB strategic plan.
- Approves new SMBCB products and services.
- Approves the annual SMBCB budget.
- Defines the SMBCB target customers.
- Examine and decide upon events or issues that affect the SMBCB image and position in the domestic and international market.

3.2. Asset and Liability Committee

- Deliberates the asset and liability management policy, credit and liquidity risks management.

3.3. New Products and Services Committee

- Analyzes the risks to which involved in developing new products and services;
- Recommends or not the approval the New Product and Service to SMBCB Management, which will determine the implementation or not.

3.4. Money Laundering Prevention Committee

- Ensures that policies and procedures related to Money Laundering Prevention in the Institution are being followed by all employees;

- Ensures that face-to-face trainings are conducted annually;
- Decides on the closure of business relationship with customers involved in money laundering and terrorism financing crimes.

3.5. Operational Risk Management Committee

- Overview of internal and external events related to operational risk;
- Inherent and residual risks;
- Database of operational risk events;
- Business Continuity Plan;
- Compliance with norms established.

3.6. Compliance Committee

- Ensures the proper administration of the Institution's activities;
- Enhances the support to the administration in accordance to the institution's strategy, policies and measures adopted;
- Ensures the dissemination of internal controls, risk mitigation and compliance with local and international applicable laws.

3.7. Project Committee

- Oversee the projects' progress;
- Anticipate and prevent future bottle-necks;
- Take corrective measures in a timely manner, if applicable.

3.8. Audit Committee

- Establish operating rules for its own operation, which must be approved by the board of directors or, if there aren't, by the Directors, formalized in writing and made available to the respective shareholders.
- Recommending to SMBCB, the hiring of external auditing company as well as its replacement, when judged necessary;
- Revising, previously to the publication, semiannual financial statements, inclusive footnotes, administration report, as well as external auditor recommendation;
- Assessment of internal and external auditors' revision effectiveness, including those related to the verification of compliance internal codes, legal rules and regulation applicable to SMBCB;
- Assessment of the accomplishment, by Senior Management, of the recommendations made by external and internal auditors;
- Establishing and publishing procedures to the reception and treatment of information in regard to the noncompliance to the rules and regulation applicable to SMBCB, besides the internal codes , including the procedures specific to the protection of service rendering and confidentiality of information;
- Recommend to the executive committee, correction or improvement of policies, practices and procedures identified within the scope of its duties;

- Conducting quarterly meetings with the Senior Management, external and internal auditors in order to verify compliance with raised recommendations, inclusive with audit plan, formalizing, in minutes, the contents of such meetings;
- Conducting meetings with management, at their request, to discuss the policies, practices and procedures identified within their respective competences.

3.9. Compensation Committee

- This committee aims to establish objectives for the Variable Compensation (RV) calculation and also a criteria for its payment based upon Resolution 3921 ("Resolution"), of Brazilian Central bank, dated November 15, 2010. It applies to Senior Management ("Director" or "Management"), except foreign directors that maintain labor relationship with the controller Sumitomo Mitsui Banking Corporation ("SMBC").

3.10. Risk Committee

- The Risk Committee shall be formed by at least 03 (three) and at most 05 (five) members appointed by the CEO, consisting of members of the Senior Management, with the participation of other members in accordance with current regulation and other invitees without voting rights.
- The Risk Committee is composed by:
 - CEO;
 - CRO;
 - Director of Planning Department;
 - Other members of Senior Management might be invited, whenever necessary.
- The attributions of the Risk Committee are:
 - To establish the operational rules for its operation, which must be approved by the CEO, formalized in writing and made available to regulators and shareholders:
 - a) policies, strategies and limits for risk management;
 - b) policies and strategies for capital management;
 - c) stress tests program;
 - d) policies of business continuity management;
 - e) liquidity contingency plan;
 - f) capital plan;
 - g) capital contingency plan.
 - To assess the risk appetite levels documented in the Risk Appetite Statement (RAS), as well as strategies for its management, considering risks both individually and on an integrated basis;
 - To oversee the CRO performance (CRO attributions' are detailed in the document "IRM Policy");
 - To oversee Senior Management's compliance with the terms of the RAS;
 - To ensure that the compensation framework doesn't encourage behavior that is incompatible with risk levels defined in RAS;
 - To comprehend, in a broad and integrated manner, the risks that can impact capital and liquidity of the Bank;
 - To understand the limitations and uncertainties regarding the evaluation of risks, models and methodologies that are used in risk management framework;
 - To assess the adherence of the risk management processes to the established risk policies;
 - To ensure the opportunity to regular training of risk management unit;
 - To keep records of its own deliberations and decisions; and
 - To analyze and discuss the minutes, the results and the recommendations of Audit Committee, regarding subjects related to risk and capital management.

4. RISK MANAGEMENT

SMBCB is constantly pursuing to evaluate and improve its risk management structure, influencing in the culture and operation mode of this Institution.

Such practice is based on procedures, methods and standardized techniques and aims to monitor, measure, mitigate and report risk exposures of any nature in the various activities and processes, developed products or services offered, in order to support the continued sustainable development of its activities.

SMBCB's Risk Management structure has been performing successfully the control and mitigation of risks that may cause damage or losses to the customers, to the environment or to its own image.

The risk management structure is under responsibility of Risk Management Department, which acts independently from business areas and audit. The Risk Management Department is subordinated to the Director of Risk, who is also responsible for Risk, Credit and Information Security departments, which the later has a dual report to the COO/CFO of the Bank.

The Risk Management Department operates in an integrated way, being responsible for the management of the following risks:

- Credit and Counterparty Risk;
- Liquidity Risk;
- Market Risk;
- Operational Risk;
- Social & Environmental Risk;
- Service Provider/Vendor Risk.

5. RISK APPETITE

The appetite for risks determines the institution's desire in taking risks to achieve its goals versus the potential return. This appetite is influenced by several factors, both internal and external, and determined by the CEO of the Bank, in line with its corporate strategy. The Bank formalizes the levels of risk appetite on RAF (Risk Appetite Framework), which consider both quantitative and qualitative aspects of risk management, including the RAS (Risk Appetite Statement).

The appetite for risks is continually reassessed according to the changes in the environment - both internal and market changes.

SMBCB is characterized by its conservative profile, which is demonstrated in its governance structure, in the definition of the RAS and the constant risk monitoring.

6. RISK EXPOSURE

All organizations are subject to several types of financial or non-financial risks that are derived from internal and external factors. Featuring deep commitment to ethics, SMBCB performs continuous monitoring of the risks to which it is exposed, providing security and comfort to its customers.

Among the major types of risks inherent in banking activities, we highlight:

6.1. Financial and Non-Financial Risks

Credit and Counterparty Risk: it is the possibility of losses associated to the non-fulfillment of the financial obligations agreed, by the borrower or the counterparty;

Market Risk: it is the possibility of losses arising from movements in market prices;

Liquidity Risk: it is the possibility that liabilities can't be met when they fall due or can only be met at an uneconomic price;

Operational Risk: it is the possibility of losses resulting from inadequate or faulty internal processes, people and systems or even external events. It includes the legal risk.

Service Provider/Vendor Risk: it is the possibility of losses related to Service Providers, such as, the improper execution of services, leakage of confidential information, bribery payments, regulatory issues, reputational issues, etc.

Social & Environmental Risk: it is the possibility of losses related to social and environmental issues that might result in problematic assets, damage to the ecosystems, reputational issues, etc.

7. CORPORATE RISK MANAGEMENT PROCESS

7.1. Objectives and Strategies

For the institution, the principles of prudence and ethics are always present in the policies, norms, procedures and goals. Decisions are based on factors that combine return with measured and evaluated risks. It also promotes the acculturation of employees at all levels.

All these initiatives provide the expansion of the operational efficiency of the institution and the consequent reduction in the level of losses, while optimizing the use of available capital.

7.2. Risk Management Policies

SMBCB has different policies, norms and procedures for performing risk management. These rules establish the basic guidelines to operate, expressed by the Management in accordance with the standards of integrity and ethical values and throughout all activities of the Institution.

Policies, norms and procedures ensure that SMBCB has a control structure consistent with the nature of its operations, the complexity of their products and services, activities, processes, systems and the extent of its risks exposure, allowing proper management, in order to ensure that these are identified, assessed, monitored, controlled and reported efficiently and effectively.

Risk management policies are aligned with the strategic goals of the Institution, to the best national and international practices and in compliance with laws and regulations, being reviewed, at least annually, by the Management and made available to all employees through internal communication tool.

7.3. Risk Management Methodology

SMBCB approaches risk management inherent to its activities within a process of continuous improvement, aiming monitor the business evolution and minimize the risks that may compromise the quality of such management.

The risk management methodology is adequate to SMBCB's activities profile, and it is worth mentioning that the Compliance structure and Internal Audit are important elements in the improvement of our methodology.

The Organization's risk management framework allows risks to be effectively identified, measured, mitigated, monitored and reported to the Management.

8. CREDIT RISK

Credit Risk is defined as the possibility of losses associated to the non-fulfilment by the borrower or counterparty to their respective obligations under the terms agreed, the devaluation of credit assets, resulting from deterioration in the borrower's risk rating, the reduction in earnings or remuneration, the advantages granted in the renegotiation and recovery costs.

Credit Risk is strongly associated with other types of risk, such as Market, Liquidity, Social & Environmental risks, among others. These types of risks often stem from the Credit Risk and may occur simultaneously.

The Bank has a single department responsible for managing risks. The structure's size is proportionate to the risks related to the products complexity offered by the Institution, operations nature and guidelines for the Bank's risk exposure and companies of the Group.

In the Bank's organizational structure, the function of Risk Management is represented by an independent Management from audit and business areas, being essential to have a vision and control independently of risk.

Management is responsible for providing the necessary resources for effective credit risk management and for monitoring the activities related to such management.

Periodic reports, as well as the guidelines adopted by Credit Risk management department are evaluated and approved by the Management of the Bank.

8.1. Credit Risk Management Process

Credit risk management is performed on centralized manner. All exposures to credit risk are analyzed, measured, classified and monitored independently by Credit Risk Management department.

SMBCB's portfolio management contemplates the control of the credit risk concentration, i.e. the excessive concentration risk of credit to:

- a) A particular customer or group;
- b) A particular sector (sector type).

SMBCB aims, at all times, to comply with Resolution 2.844, which establishes 25% of the Regulatory Shareholders Equity as maximum limit by customer exposure. To decrease the possibility of an unintended breach (ex.: due to drastic change in USD/BRL FX rate), the Bank uses internal concentration limits that are lower than 25%, which depend on the indexes of current positions.

Credit Risk department participates actively in the improvement process of the customers' risk rating models, performing periodic monitoring of the main default events, the provisioning level against expected and unexpected losses.

According to the information dissemination philosophy about risk, meetings are held focusing on the credit risk monitoring and control, the credit committee, with the participation of the business departments as well as Management members.

The credit risk managing process includes a periodic review which aims to incorporate the best practices and improvement of management processes.

8.2. Counterparty Credit Risk

The counterparty credit risk, to which SMBCB is exposed, is the possibility that a counterparty does not fulfill its obligations, financial or not, causing losses to the institution.

SMBCB has control of the current position and the potential future exposure of transactions that have counterparty risk. Every risk exposure and counterparty performance is analyzed in the extension of credit limit process as part of general credit limits granted to customers.

8.3. Extension of credit

The extension of credit process has as main bases: security, profitability, potential growth, liquidity and overall relationship with the group.

In the evaluation and overall risk rating of the customer or economic group the following aspects are considered: quantitative aspects (economic and financial indicators) and qualitative aspects (personal information and business prospects of the company), related to the customers capacity to fulfill their commitments.

All loans operation, regardless of their value and market segment of the borrower's credit, is evaluated according to the criteria adopted by the Bank.

Loan proposals transact through an overall system used by the parent company Sumitomo Mitsui Banking Corporation ("Head Office"), automated and parameterized, which purpose is to provide indispensable information for analysis, granting and monitoring loans, thus minimizing the inherent risks in the operations and according to Head Office's Credit Policy, all loan proposals comply with the approval levels established in SMBC Group.

8.4. Credit Risk Mitigation

The guarantees are analyzed individually for each customer, based on strict rules designated by the Head Office involving the whole process for extension of credit.

Thus, the definition of credit risk mitigators are performed individually, when granting credit, considering the settlement capacity through cash flow analysis and understanding of the potential and actual business conditions.

Guarantees are considered as a second source of payment, to ensure the credit recovery and its evaluation is performed individually for each customer based on strict rules of the Head Office.

The evaluation of these instruments' efficiency is carefully accomplished periodically, in order to ensure its sufficiency and liquidity.

8.5. Credit Risk Rating

According to Article 2 of Resolution 2682, SMBCB customer's operations that have letters of guarantees as a means of mitigating credit risk are assessed as to their efficiency and liquidity. In this sense the credit operations follow at least the criteria set by Resolution 2682 regarding the classification of the operations.

The methodology for evaluating credit risk, besides providing subsidies to establish minimum standards for extension of credit and managing risks, enables the definition of differentiated credit policies according to the characteristics and size of the customer. In this sense, it provides foundation for both the correct transactions pricing as well as for the definition of adequate guarantees in every situation.

SMBCB complies with local regulations, with specific criteria for the classification of credit operations and rules for the allowance of doubtful debts.

This regulation determines that credit operations classification for a customer or economic group should be defined considering the one that presents the higher risk, assuming, exceptionally, diverse classification for an operation, observed the nature aspects and purpose of the transaction, the guarantees characteristics, especially in regards to the adequacy and liquidity, and the transaction amount.

Customers risk ratings are based on statistics' procedures and judgmental analysis, quantitative and qualitative information. Classifications are made in a corporate level and followed regularly, with the objective of preserving the loan portfolio quality.

For constituting the applicable provisions, it must be classified according to criteria established by Resolution 2.682 of the National Monetary Council.

SMBCB	Japanese companies	Non japanese companies
Obligor Grade	Rating BACEN	Rating BACEN
1	-	-
2	AA	AA
3	AA	AA
4	AA	AA
5	AA	AA
6	AA	AA
7	-	AA
8	AA	AA
9	-	AA
10	AA	A
11	A	A
12	B	B
13	B	B
14	C	C
15	D	D
16	E	E
17	F	E
18	H	H

For performing and nonperforming customers the Bank is the provision for doubtful accounts based on the table below:

Obligor Grade	Japanese companies			Non japanese companies		
	Rating BACEN	Minimum Provision BACEN	Internal Provision	Rating BACEN	Minimum Provision BACEN	Internal Provision
1	-	-	-	-	-	-
2	AA	0,00%	0,00%	AA	0,00%	0,01%
3	AA	0,00%	0,01%	AA	0,00%	0,03%
4	AA	0,00%	0,04%	AA	0,00%	0,09%
5	AA	0,00%	0,07%	AA	0,00%	0,18%
6	AA	0,00%	0,14%	AA	0,00%	0,20%
7	-	0,00%	-	AA	0,00%	0,22%
8	AA	0,00%	0,24%	AA	0,00%	0,23%
9	-	0,00%	-	AA	0,00%	0,38%
10	AA	0,50%	0,42%	A	0,50%	0,57%
11	A	0,50%	0,71%	A	0,50%	0,69%
12	B	1,00%	1,08%	B	1,00%	1,45%
13	B	1,00%	1,31%	B	1,00%	1,45%
14	C	3,00%	4,15%	C	3,00%	5,67%
15	D	10,00%	23,72%	D	10,00%	27,62%
16	E	30,00%	39,28%	E	30,00%	32,05%
17	F	50,00%	56,85%	E	50,00%	46,98%
18	H	100,00%	100,00%	H	100,00%	100,00%

The values for doubtful accounts are calculated based on percentages indicated above, "internal provision" on the outstanding balance of loans outstanding and defaulting.

8.6. Credit Risk Exposure

Weighted values in thousand R\$:

Weighting Factor	Mar 31st, 2019	Mar 31st, 2018
20	6.556	6.395
50	892.620	610.003
100	2.719.402	3.549.314
250	39.514	25.408
300	-	-
CVA	27.385	838
Total	3.685.477	4.191.958

Average weighted value in the trimester:

Weighting Factor	Mar 31st, 2019	Mar 31st, 2018
20	6.149	5.198
50	838.215	606.594
100	2.925.918	3.643.565
250	30.304	15.763
300	-	36.767
CVA	35.217	1.474
Total	3.835.803	4.309.361

Credit Portfolio

Credit operation portfolio is summarized as following:

By operation

Description	Mar 31st, 2019	Mar 31st, 2018
Advances to depositors	2	57
Overdraft account	26.578	26.349
Resolution no. 3844	117.752	100.256
BNDES on-lending	5.637	26.499
Compror financing	21.195	23.591
Working Capital	601.955	538.070
Export Credit Note (NCE)	192.559	546.894
Financing for individuals	-	-
Financing in foreign currency	62.750	242.122
Total loans operations	1.028.428	1.503.838
Advances on foreign exchange contracts	126.739	276.177
Income receivable from advances	1.639	2.910
Total loans portfolio	1.156.806	1.782.925

By concentration

	Mar 31th, 2019	Mar 31th, 2018
20 largest customers balance	1.071.067	1.672.503
Portfolio rating %	99,12%	93,81%

By business sector

Private sector	Mar 31th, 2019	Mar 31th, 2018
Industry	1.054.948	1.471.274
Trade	60.848	281.038
Other services	41.010	30.613
Individuals	-	-
Total	1.156.804	1.782.925

By maturity

SMBCB did not have operations in delay for this Quarter.

SMBCB did not have operations written off as losses in the periods herein reported

By rating

Trimester	Risk rating	Provision rate - %	Total transactions	% of portfolio	Allowance recognized
Mar 31th, 2019	AA	-	1.091.113	94	890
	A	0,5	65.693	6	22
			1.156.806	100	912

Trimester	Risk rating	Provision rate - %	Total transactions	% of portfolio	Allowance recognized
Mar 31th, 2018	AA	-	1.725.418	97	3.251
	A	0,5	3.220	-	22
	B	1	57	-	1
	C	3	54.230	3	2.251
			1.782.925	100	5.525

Other Credits Operations

Private sector	Mar 31th, 2019	Mar 31th, 2018
Interbanking Onlending	193.328	622.037
Guaranties	1.419.856	1.661.979
Credits to Released	31.599	105.774
Total	1.644.783	2.389.790

We present below the amounts related to contracts which there is no role of clearinghouse as main counterparty, segregated into contracts without and with guarantee:

Product	Contracts	Mar 31th, 2019	Mar 31th, 2018
Repo operations	With guarantees	1.858.518	2.167.257
	No guarantees		-
Unsettled operations	With guarantees		-
	No guarantees	643.570	689.078
Other	With guarantees		-

Operations	No guarantees	2.574.272	3.441.169
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We present below the amounts related to contracts which there is role of clearinghouse as main counterparty, segregated into contracts without and with guarantee:

Product	Contracts	Mar 31th, 2019	Mar 31th, 2018
Derivatives	With guarantees	6.137.658	3.214.728
	No guarantees	3.583.522	516.665
Other Operations	With guarantees	-	-
	No guarantees	761.911	420.032

SMBCB does not operate in credit derivatives segment and does not use compensation arrangements as defined in Resolution no. 3.263 of the National Monetary Council.

SMBCB has not performed the assignment of Credit transactions, acquisition Finance or financial asset sales, as well as securitization transactions.

8.7. Internal Communication

Credit risk is monitored on a daily basis in order to maintain the risk levels in accordance with the limits established by the Institution. Risk management reports are available to business areas and the Management.

9. MARKET RISK

Market risk is the possibility of losses resulting from fluctuations in market prices

Exchange rate risk is the possibility of loss due to changes in currency value equivalent to a position in foreign currencies attributable to a change in the exchange rate.

Interest rate risk is the possibility of loss due to changes in the present value of future cash flow attributable to changes in interest rates.

In line with best corporate governance practices, aiming at preserving and strengthening Market and Liquidity risks management in the Institution, market risk management in SMBCB involves many areas. Those areas have specific responsibilities in the process, ensuring an effective framework for measuring and controlling market risk. The Management approved the Market and Liquidity Risks Management Policy, which review is conducted, at least annually, in order to provide the main guidelines for performance acceptance, control and market and liquidity risks management.

9.1. Market Risk Process Management

The Institution's market risk exposure profile is conservative, in which guidelines and limits are daily monitored by an independent risk unit.

Market Risk Management Policy is based on daily measurements of the Bank's market risk positions Limits/Guidelines to "Stop Loss". Risk Management department also monitors market risk through the methodology of sensibilities and stress tests.

9.2. Limits definition

SMBCB's limits structure is defined by the Head Office's risk department, according to the global policy from Sumitomo Mitsui Financial Group, taking into consideration the SMBCB's profile in the country.

In case any changes are necessary, it can only be made after a competent jurisdiction's approval.

9.3. Risk Measurement

In regards to the Trading portfolio the market risk monitoring is performed through models and parameters

established by Brazilian Central Bank.

According to methodology published by Central Bank, interest rate risk of the banking book is calculated using the methodologies ΔNII and ΔEVE .

Stress Tests of the Banking portfolio are performed at least quarterly, as per Brazilian Central Bank model:

- a) estimating the percentage of fluctuation in the market value of transactions not classified in the Trading portfolio, in relation to the Regulatory Shareholders Equity, and with usage of compatible shock with the 1st and the 99th percentiles of a historical changes in interest rates distribution, considering the maintenance period (holding period) of one year and an observation period of five years;
- b) estimating the amount of parallel shocks basis points in interest rates necessary to cause reductions in the market value of transactions not classified in the trading portfolio corresponding to 5% (five percent), 10% (ten percent) and 20% (twenty percent) of the Regulatory Shareholders Equity;
- c) Performing the test individually to each risk factor that contributes, at least, 5% of all exposures related to transactions not classified in the trading and, in an aggregated manner, for remaining operations.

9.4. Derivatives

Derivative financial instruments, consisting by swaps and NDFs, have their receivable or payable differential accounted in asset or liability accounts, adjusted to market value against the results.

According to Circular No. 3.082, dated of January 30, 2002, and Circular-Letter No. 3.026, dated of July 5, 2002 from Brazilian Central Bank, derivative financial instruments are evaluated by their market values, and the appreciation or depreciation record is accounted in the income.

Derivative instruments, consisting of swaps, NDFs and futures, are in custody at B3 - BM&FBOVESPA and CETIP.

We present below the asset and liability positions exposures and the amounts recorded in accounts for assets, liabilities and compensation, segregated by indexer categories, maturity dates, reference and accounting amounts, which counterparty are customers:

Swap e NDF:

	2019				2018
SWAP	8.014	-	114.253	1.420.555	854.081
CDI x DOLAR	-	-	871	205.005	169.380
CDI x LIBOR	-	-	39.084	157.815	157.815
CDI x PRE	-	-	624	4.176	7.828
DOLAR x CDI	-	-	61.403	330.755	491.089
PRE x DOLAR	4.462	-	11.223	313.093	20.469
LIBOR x DOLAR	-	-	1.047	189.360	-
PRE x CDI	3.553	-	-	220.350	7.500
NDF	47.170	-	13.634	2.186.070	170.173
PRE x DOLAR	1.947	-	7.913	320.514	56.768
DOLAR x PRE	42.456	-	4.526	1.752.731	-
DOLAR x DOLAR	-	-	458	7.836	83.731
PRE x IENE	-	-	405	12.988	29.588
EURO x PRE	2.768	-	333	91.991	86
PRE x GBP	-	-	0	10	-
Total	55.184	-	127.887	3.606.625	1.024.254

Notional By Maturity

	2019			
	Notional			Total
	Up to 90 days	From 91 to 360 days	Over 360 days	
SWAP	3.656	268.502	1.148.397	1.420.554
CDI x DOLAR	-	10.000	195.005	205.005
CDI x LIBOR	-	-	157.815	157.815
CDI x PRE	788	1.324	2.064	4.176
DOLAR x CDI	2.868	8.494	319.393	330.755
PRE x DOLAR	-	235.784	77.310	313.093
LIBOR x DOLAR	-	-	189.360	189.360
PRE x CDI	-	12.900	207.450	220.350
NDF	900.879	1.242.297	42.893	2.186.070
PRE x DOLAR	288.234	32.280	-	320.514
DOLAR x PRE	507.656	1.202.181	42.893	1.752.731
DOLAR x DOLAR	-	7.836	-	7.836
PRE x IENE	12.988	-	-	12.988
EURO x PRE	91.991	-	-	91.991
PRE x GBP	10	-	-	10
Total	904.535	1.510.799	1.191.290	3.606.624

Notional By Place of Trading

	2019			2018
	Stock Exchange	Counter	Notional	Notional
Swaps	342.431	1.078.123	1.420.555	854.081
NDF	-	2.186.070	2.186.070	170.173
Total	342.431	3.264.193	3.606.625	1.024.254

Futures:

2019					
Reference Value (Accounting)					
	Trading Venue	Up to 90 days	From 91 to 360 days	Over 360 days	Total
Futures - Notional	B3 – BM&FBOVESPA	2.187.308	2.447.969	1.341.842	5.977.119
Buy		1.132.635	1.698.999	828.958	3.660.591
Exchange Coupon		982.506	597.671	721.217	2.301.394
Foreign Currency		4.896			4.896
Interest Rate		145.233	1.101.328	107.741	1.354.301
Sell		1.054.673	748.971	512.884	2.316.528
Exchange Coupon		159.330	748.971	169.764	1.078.065
Foreign Currency		892.344			892.344
Interest Rate		2.999		343.120	346.119

2018					
Reference Value (Accounting)					
	Trading Venue	Up to 90 days	From 91 to 360 days	Over 360 days	Total
Futures - Notional	B3 – BM&FBOVESPA	383.333	1.026.974	1.296.832	2.707.139
Buy		246.969	679.344	1.029.445	1.955.758
Exchange Coupon		9.838	612.796	961.710	1.584.344
Foreign Currency		220.681			220.681
Interest Rate		16.450	66.548	67.735	150.733
Sell		136.364	347.630	267.387	751.378
Exchange Coupon		14.954	322.590	105.543	443.087
Foreign Currency		110.495			110.495
Interest Rate		10.915	25.040	161.844	197.799

The market value of derivative financial instruments is determined by discounting the future values at present value according to the interest rate curves obtained by employing the market method, which is mostly based on data disclosed by B3 - BM&FBOVESPA.

9.5. Hedge Accounting

On March 31 st, 2017, the Bank had operations with derivative financial instruments aimed at mitigating the effect of exchange variation in funding performed in foreign currency, as well as some loan transactions. Such operations were designated as market risk accounting hedge and were performed on the over-the-counter market.

Market value assessment

The market value assessment regarding the funding in foreign currency and the loan transactions were performed using Swap and future operations, designated as hedging instruments, in compliance the BACEN

Circular 3082/02.

1. Swap:

Maturity – Market Value – 2019					
Descrição	Index	Up to 12 months	1 to 3 years	3 to 5 years	Total
Swap	PRE	3.410	3.045	594	7.049
Total		3.410	3.045	594	7.049

	<u>2019</u>	<u>2018</u>
Items Object of hedge		
Updated value by the conditions agreed	6.571	7.658
Market value	7.026	8.187
Adjustment value	(455)	(529)
Hedge instruments		
Market value	7.049	8.211

2. Futures:

Maturity – Market Value – 2019					
Descrição	Index	Up to 12 months	1 to 3 years	3 to 5 years	Total
Futures	Exchange Coupon	859.539	580.033	-	1.439.572
Futures	Interest Rate	2.954	30.405	-	33.358
Total		862.493	610.438		1.472.930

	<u>2019</u>	<u>2018</u>
Items Object of hedge		
Updated value by the conditions agreed	1.476.526	1.460.438
Market value	1.470.387	1.443.096
Adjustment value	6.140	17.342
Hedge instruments		
Market value	1.472.930	1.420.936

10. LIQUIDITY RISK

Liquidity risk includes the funding risk and the product or market risk.

Funding liquidity risk is the uncertainty that the bank will be able to fulfill its funding needs or to compensate the mismatches in fees and maturities.

Market liquidity risk is the uncertainty that the Bank will be unable to liquidate or compensate positions efficiently, ie at reasonable prices.

10.1. Liquidity Risk Management Process

The global Market and Liquidity Risk Management Policy is established by the Head Office approved by the Management, and are supported by three pillars: Money Gap Management, establishment of the contingency plan and additional resources for emergency liquidity. Its objective is to ensure the existence of norms, criteria and procedures that assure the Institution in regards to the establishment of the additional liquidity fund as well as the existence of a strategy and action plans for liquidity crisis situations. The policy and controls comply with the provisions established by regulations of the National Monetary Council.

This risk is controlled through proper planning over the cash flow needs, which can be monitored with the implementation of limits for mismatches in the cash flow, "money gap".

Money Gap measures the funding need within a certain period of time, which is, in the case of SMBCB, one day, two days, a week and one month, and is calculated on a cash flows basis.

To strengthen liquidity risk control it has been established a fixation and control over the "minimum value for an additional liquidity" that corresponds to a minimum position in government securities that the Bank should maintain in its portfolio, free from any commitment. This value is assessed based on cash flow estimates under adverse scenarios.

10.2. Control and Monitoring

The control and monitoring over the positions are held independently from the Treasury Department. Risk department is responsible for measuring the minimum level of liquidity, reviewing policy, norms, criteria and procedures and studies for new recommendations.

10.3. Internal communication

Market and liquidity risk department, regardless of business management, monitors fulfillment of limits and provides management reports daily, presenting the control of fixed rates positions in the trading portfolio, foreign exchange exposure, to business departments, Management and Head Office, as well as simulations future based on scenarios and periodic presentations to the Management, through Asset and Liability Committee.

11. OPERATIONAL RISK

SMBCB has adopted the definition of operational risk from Basel Committee:

"The risk of loss resulting from inadequate or failed internal processes, people and systems or from external events."

Therefore, the operational risk is related to losses originated from operational errors of any sort, which affects the profit of the Bank.

This definition includes legal risk associated to the unsuitability or deficiency in contracts signed by SMBCB as well as the sanctions caused by unfulfilled of legal devices and the compensations by mischief to third parties resulting of SMBCB activities

11.1. Operational Risk Management Process

Operational Risk Management aims to identify, evaluate, monitor, control and mitigate the operational risks events. It can be understood as the cyclical procedure divided in separate steps in which each step addresses a specific aspect of operational risk. Segmenting the cyclical procedure into phases with input and output criteria clearly defined, SMBCB can determine which specific activities are necessary to manage the operational risk.

Operational risk Management should not be confused with the complete mitigation over all operational risks; the definition of all risks which have been weighted that an organization is able to accept the risk appetite, is essential for aligning the structure of controls inside of the organization.

The Operational Risk structure defined in SMBCB is conducted by two independent and specific corporate areas: Information Security and BCM team responsible for Business Continuity Plan and Risk Management Department responsible to consolidate operational risks events. Both teams are subordinated to the CRO of the Bank (Information Security and BCM has dual report to the COO/CFO). These tools (operational risks and internal controls) aim at improving the environment of controls and, consequently, disseminate operational risk and internal controls culture within SMBCB.

11.2. Control and Monitoring

SMBCB addresses the operational risk management within a process of continuous improvement, to monitor the business dynamic evolution and minimize the existence of gaps that could compromise the quality of management.

The Policy is driven by the following principles:

- Define the roles of the operational risk management for identification, monitoring, measuring the risks and controls and releasing operational risk report;
- To strengthen internal control environment through a wide spread global culture of operational risk;
- Enhance the compliance under the regulations which rule the operational risk management;
- Decrease the costs and the volatility of the profit by operational risks occurrences prevention;
- Establish, in a regular basis, a line of report to the Management, in order to inform the relevant operational risks events.

The guidelines to quantify the impact of an operational risk event should follow a linear and simple approach for facilitating the integration in a single measure of risk. In this scenario, to measure the weight of severity of an event of operational risk it must calculate the impact versus the probability of occurrence versus the frequency of occurrence. The principles to measure the operational risk should include as follows:

- **Decomposing the operational risk:** Operational Risks in any product/business unit should be identified.
- **Measures of operational risk:** A structure of operational risk including the types of risk should be utilized for calculating the weight of operational risk across all business units.
- **Measures based on probability:** A methodology based on the probability should be applied to allow the management to estimate the probabilities of an event to occur, considering both the improbable occurrences as well as and high frequency occurrences.
- **Measures based on sensibility:** The business units should be capable to measure the sensibility of its positions regarding each factor under operational risk.

11.3. Operational Risk Event Data Base

The main purpose to establish a database on operational risk is to assist the system for supporting a decision, storing different types of operational risk data in a single structure, facilitating any kind of analysis (quantitative and/or qualitative) which can be accomplished using all data available regarding operational risk.

The events of operational risk which can cause direct/indirect losses and/or cost of opportunity are reviewed, analyzed and monitored in order to improve the operational procedures and develop historical loss data.

11.4. Internal Communication

Operational Risk Management unit follows a continuous cycle that addresses the events occurred in SMBCB, reporting the mitigation actions taken, monitoring these actions and further analysis to determine the results.

The managerial reports produced by Operational Risk unit are sent on a monthly and quarterly basis to the Management and Head Office and reported monthly in the Operational Risk Management Committee.

11.5. Business Continuity Management - BCM

In order to be prepared to minimize financial, operational, legal and regulatory impacts occasioned by the unavailability of physical and logical access and providing customers with the essential products and services, as well as information required by official organizations and representatives abroad, SMBCB has established a Business Continuity Plan (BCP). BCP aims at establishing and deploying the means/mechanisms to protect the physical integrity of persons and to ensure the continuity of critical business in the Bank, in case of events/incidents that may generate interruptions/unavailabilities, such as, but not limited to: fire, explosion, bomb threat, strikes, social unrest, disruption of electricity supply and failure in critical systems or in SMBCB's technology infrastructure and support.

The Plans focus and prioritize the actions and procedures against major risks to which the Institution is exposed, based on "Physical and Logical Risk Analysis (ARFL)" and in the "Business Impact Analysis (BIA)".

11.6. Management Process

The management process of Business Continuity Plans consists in the monitoring of all activities involving business continuity, since the establishment of policies, definition of methodologies, systems, etc, to assess the suitability of the Institution's Business Continuity Plans.

Development works, maintenance and improvements of BCPs are coordinated by Information Security and BCM Department and reported semiannually to the Management, through the Management Committee for Operational Risk.

Regarding the calculation methodology SMBCB adopts the Basic Approach Methodology (BIA) based on the Central Bank regulation (Circular 3.640).

12. SOCIAL & ENVIRONMENTAL RISK

The risk of SMBCB becoming a party to environmental damages by extending credit to a company which activities damages the environment; thereby hurting the public image of SMBCB. Further, the environmentally damaging activities of the company may lead to decreases in sales and asset value, and increases in expenses and liabilities due to legal and social sanctions which erodes the repayment capability (credit risk) and causes the value of the collateral to deteriorate.

The Social & Environmental Risk can occur due to issues related to third party service providers.

12.1. Social & Environmental Risk Management Process

The Social & Environmental Policy is reviewed and approved by the Directors. The policy and the controls are established to comply with the norms issues by the Conselho Monetário Nacional. The Social & Environmental Risk linked to the credit concession is controlled together with Head Office.

The Social & Environmental Risk linked to service providers is managed by the Service Providers Policy.

12.2. Control and Monitoring

The control of the exposure (linked to credit or service providers) is managed by the 1st Line of Defense. In case of credit, it's managed by Front Office departments. In case of service providers, it's managed by the responsible for each contract.

The monitoring of the metrics associated with the Social & Environmental Risk are controlled by RMD-ORM (Operational Risk Unit of RMD team), in an independently manner of other departments.

12.3. Internal Communication

The RMD-ORM monitors the exposures to the Social & Environmental Risk, the compliance with limits (when applicable) and provides managerial reports to the Directors and to Head Office, in addition to the materials that are presented in the committees.

13. SERVICE PROVIDERS RISK

SMBCB understands that the responsibilities and obligations of the Bank will not be transferred to the outsourcer, and, as such, that the Bank is subject to the same responsibilities and obligation as if the services were performed in-house.

SMBCB should ensure that the outsourcer strictly observes confidentiality and that they have an effective information management structure in place. Outsourcing to a third party without an appropriate information management structure should be avoided.

All outsourcing agreements should include provisions that allow local authorities and regulators to conduct inspections or audits of the outsourcer.

SMBCB should ensure that the intermediary third parties never violate any applicable laws and regulations including anti-bribery and corruption laws.

13.1. Processo de Gerenciamento do Risco Prestadores de Serviços

The Service Providers Policy is reviewed and approved by the Directors. The policy and the controls are established to comply with the norms issues by the Conselho Monetário Nacional.

13.2. Control and Monitoring

The control of the exposure of service providers is managed by the 1st Line of Defense, which is performed by the responsible for each contract.

The monitoring of the metrics associated with the Service Providers Risk are controlled by RMD-ORM (Operational Risk Unit of RMD team), in an independently manner of other departments.

13.3. Internal Communication

The RMD-ORM monitors the exposures to the Service Providers Risk, the compliance with limits (when applicable) and provides managerial reports to the Directors and to Head Office, in addition to the materials that are presented in the committees.

14. CAPITAL ADMINISTRATION

14.1. Required Regulatory Shareholders Equity (RWA)

The capital management process is conducted in order to provide the conditions for achieving the strategic goals of the institution, taking into account the economic and commercial environment in which it operates. This process aims to ensure that the institution maintains a solid capital base to support the development of activities and cope with the risk, and meet regulatory capital requirements.

Pursuant to the regulations of the Central Bank of Brazil, financial institutions must permanently maintain capital consistent with the degree of risk of its asset structure considering a minimum of the sum of the following portion:

$$RWA = RWA_{cpad} + RWA_{mpad} + RWA_{opad}$$

$$RWA_{mpad} = RWA_{jur} + RWA_{acs} + RWA_{com} + RWA_{cam}$$

Where:

- RWA_{cpad} : Portion relative to credit risk exposures;
- RWA_{mpad} : portion relative to Market risk exposures subject the calculation of capital requirement by standardized approach, which takes place by the sum of the following portions;
 - RWA_{jur} : portion relative to the exposures subject the variation in interest rate;
 - RWA_{acs} : portion relative to the exposures subject the variation of stock prices;
 - RWA_{com} : portion relative to the exposures subject the variation of prices of goods (commodities);
 - RWA_{cam} : portion relative to the exposures in gold, in foreign currency and assets subject to currency fluctuations;
- RWA_{opad} : portion relative to the calculation of capital requirement to operational risk.

Furthermore, SMBCB must maintain the Equity Reference – PR enough to cover the interest rate risk of the transactions amounts not included in the book of business (banking portfolio Rban).

The Bank is within the limits established by CMN Resolution 2.099/94 with changes introduced by CMN Resolution 4.192/13 and 4.193/13 and Central Bank Circular No. 3.644/13, with a equity to weighted assets ratio, as follows:

	Mar 31th 2019	Mar 31th 2018
Credit Risk	3.690.414	4.191.957
Market Risk	502.083	564.705
Operational Risk	340.183	336.928
Risk-weighted assets (RWA)	4.532.680	5.093.590
Portion Rban	6.449	10.267
Required Equity Tiers I e II (PR)	1.632.543	1.557.992
Required Regulatory Shareholders Equity (RWA*8,265%; 9,25% in 2016)	362.614	439.322
Margin of Heritage Reference Required	1.269.928	1.118.670
Basel Ratio (IB) - PR/RWA	36,02%	30,59%

Additionally, SMBCB also keeps enough Shareholders Equity to cope with the transactions of Banking book. The methodology used is IRRBB, which is calculated using ΔNII e ΔEVE metrics.

SMBCB has a process to assess the suitability of the Shareholders Equity, which aims to measure the capital need to support all inherent risks to the business, whether financial or nonfinancial, in the course of its activities, to comply with the Institution's strategic interests.

Detailed information related to SMBCB's shareholders Equity, from the perspective of financial and economic consolidated can be find below.

14.2. Details of Required Regulatory Shareholders Equity

The Referential Equity is calculated from the base date October 2013 by the rules of Resolution 4192 and 4193/2013, being composed by the Tier I and II.

Following the guidelines of these Resolutions, the PR (Regulatory Capital) Tier I consists of the sum Principal Capital and Supplementary Capital.

The Common Equity is calculated by:

1. Sum of the values:
 - Social Capital;
 - Capital reserves, revaluation and profits;
 - Unrealized gains arising from asset valuation adjustments;
 - Remains of retained earnings;
 - Credit income accounts;
 - Balances positive value adjustment of derivative financial instruments;
2. Deduction of corresponding values:
 - Unrealized losses resulting from adjustments to asset valuation and securities;
 - Losses or Accumulated losses;
 - Accounts negative result;
 - Negative balances of the fair value of derivative financial instruments market adjustment;
 - Prudential adjustments as described in Article 5 of Resolution 4192;

The Supplementary Capital is calculated by:

- 1- Sum of the values corresponding to the instruments that meets the requirements established in Article 17, and;
- 2- Deduction of corresponding values:

Funding instruments issued by a financial institution authorized to operate by the Central Bank of Brazil or institution located abroad exercising equivalent activity to the financial institution in Brazil that do not compose the conglomerate, pursuant to article 8 and the Company's own shares, authorized to select Supplementary Capital, acquired, indirectly or synthetic form, including:

- Shares in investment funds proportionately to these instruments in the fund portfolio;
- Entity likened the financial institution or controlled non-financial entity, or
- Derivative transactions, including derivatives and indices;

The Reference Equity Tier II consists of the sum of the instruments that meet the requirements of Article 20, less the corresponding values to the catchment instruments issued by institution authorized by the Central Bank or institution located outside exercising equivalent activity to the financial institution in Brazil that do not compose the conglomerate in Article 8 and the Company's own shares, authorized to select Level II, acquired, indirectly or synthetic form, including through:

- Shares in investment funds proportionately to these instruments in the fund portfolio;
- Entity likened the financial institution or controlled non-financial entity, or
- Derivative transactions, including derivatives indices;

From the base date of September 2013, the calculation of the Reference Assets began to contemplate and

consolidate operations of Cayman Islands Branch.

Analytical composition of the Reference Equity:

Tier I	Mar 31th, 2019	Mar 31th, 2018
Capital	793.819	758.819
Reserves	184.462	142.908
Net Income	8.159	20.542
Evaluation Unrealised Asset and Securities	2.051	-
(-) Prudencial Adjustments	(22.333)	(33.370)
Total Tier I	966.159	884.442
Tier II		
Subordinates Loan Instruments	666.384	673.550
Total Tier II	666.384	673.550
Total of Reference Equity	1.632.543	1.557.992

14.3. Capital Management

The Capital Management is defined as a continuous process of monitoring and controlling of capital maintained by the institution, assessment of capital need to cover the risks which the institution is exposed to, both in normal and Stress scenarios; and planning goals and capital needs, considering the institution strategic objectives.

The capital management framework is approved and reviewed at least annually by Management. The structure of capital management is under Risk Management Department responsibility, which acts independently from the Business and Audit areas. The risk management structure is under responsibility of Risk Management Department, which acts in a independently of business areas and audit. The Risk Management Department is subordinated to the Director of Risk, who is also responsible for the departments Legal, Compliance and Information Security, which the later has a dual report to the COO/CFO of the Bank. The structure is proportional to the risks related to the complexity of the products offered by the institution, the nature of the operations and Bank and its group companies risk exposures guidelines part of the consolidated economic-financial. It aims to identify and assess all relevant risks of the institution in accordance with policies and strategies to maintain capital consistent with the incurred risks.

In order to adopt a prospective posture and anticipate the need of capital, the Bank has established a New Product & Services Committee, with the permanent participation by Risk Management Department, when an analysis of the product and/or service is performed before its implementation in the institution.

The Bank does not adopt the Internal Capital Adequacy Allocation Process (ICAAP).

Risk Management Department monitors on a daily basis the portfolio behavior and in case of discrepancy notifies Management immediately in order to give proper treatment to capital adequacy.

14.4. Leverage Ratio

In October 2015 Central Bank Circular No. 3748 established the leverage ratio calculation methodology (RA) that defined as the ratio of Tier I capital and total exposure of the institution, in order to avoid excessive leverage of financial institutions and the consequent increase in systemic risk, causing impacts on the economy.

The following is the common model of disclosure of information on the Leverage Ratio and the Comparative Overview of the published financial statements and the Leverage Ratio.

Common Model of Disclosure of information on the Leverage Ratio

Line	Item	Amounts in Thou (R\$)
Items recorded in the balance sheet		
1	Equity items, except for derivative financial instruments, securities amounts received loans and resale to settle in repos	5.256.201
2	Adjustments related to asset deducted in the Level I verification	(41.266)
3	Total exposures recorded in BP	5.214.935
Operations Instruments Financial Derivatives		
4	Replacement value on derivatives	97.285
5	Potential future gain arising from derivative transactions	46.778
11	Total exposures relating to derivative financial instruments Repurchase and loans Securities (TVM)	144.063
Repurchase and loans Securities (TVM)		
		1.858.518
12	Investments in repurchase agreements and securities lending	
	Adjustment relating to repurchases to be settled and creditors securities	0
13	Loan	1.122
14	Value for the counterparty credit risk	
16	Total exposures related to repurchase agreements and securities lending and securities (sum of lines 12 to 15)	1.859.640
Items not recorded in the balance sheet (BP)		
17	Reference value of transactions not recorded in BP	1.449.937
18	Set on the application of specific FCC to operations not recorded in BP	(28.439)
19	Total exposures not accounted for in the balance sheet Patrimonial	1.421.498
20	NW Level I	948.059
21	Total Exposure	8.640.136
Leverage Ratio (RA)		
22	Leverage ratio of Basileia III	10,97

Comparative Overview of Financial Statements and Ratio Leverage

Linha	Item	
1	Total assets according to the published financial statements	7.045.998
2	Adjustment resulting from accounting consolidation differences	-
3	Set on the assigned or transferred assets with substantial transfer of risks and benefits and accounted for	-
4	Adjustment relating to the reference values set and to future potential gains on derivatives financial instruments	144.063
5	Adjustment related to repurchase transactions and securities lending	1.122
6	Adjustment relating to transactions not accounted for in the total assets of the prudential conglomerate	1.421.498
7	Other adjustments	27.455
8	Total Exposure	8.640.136

15. SUBORDINATED DEBT BY MATURITY

The Bank has a loan of \$ 40 million with the controlling shareholder Sumitomo Mitsui Banking Corporation for a period of 15 years, which was authorized by the Central Bank on November 10, 2006 which was extended in 2017 for a total period of 18 years, such extension being authorized by BACEN on December 19, 2017. Such loan continues to be considered as subordinated debt, integrating Tier II capital base of the Bank.

The Bank obtained a new loan of \$ 160 million in October 2013 for a period of 10 years, which was authorized by the Central Bank on December 5, 2013, also to integrate Tier II capital base of the Bank . Both loans are now allowed based on the terms of Resolution No. 4,192 of June 1, 2013.

16. FINAL CONSIDERATIONS

SMBCB monitors actively national and international regulations, as well as the banks associations' discussions on the subject, in order to be prepared to deal with any new measures under its current level of capitalization.

All information disclosed in this present report has been duly approved and under the responsibility of Management of the Institution.