Global systemically important banks indicators

The Basel Committee on Banking Supervision (Basel Committee) has established a number of indicators that help determine whether a bank can be classified as a Global Systemically Important Bank, or G-SIB. Banks that meet the criteria are subject to additional supervisory requirements aimed at mitigating systemic risk in the financial system. ING reports these indicators every year to the Basel Committee (through DNB). We are also required to publish the main indicators on our external website. These are published in the Investor Relations section.

The table below displays the 12 size indicators for ING Groep N.V. as at 31 December 2019. These size indicators are unaudited and based on the definitions included in the instructions of the Basel Committee. ING usually reports additional memorandum data as well. Under Covid pandemic related relaxation measures published by the Basel Committee these parts are not required this year.

<table>
<thead>
<tr>
<th>Category</th>
<th>Individual indicator</th>
<th>2019 Value (in € mln)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Size</td>
<td>Total exposures as defined for use in the Basel III leverage ratio</td>
<td>1,190,776</td>
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<tr>
<td>Interconnectedness</td>
<td>Intra-financial system assets</td>
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<tr>
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<td>Intra-financial system liabilities</td>
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<tr>
<td>Substitutability/financial institution infrastructure</td>
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<td>Assets under custody</td>
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<td>Underwritten transactions in debt and equity markets</td>
<td>38,114</td>
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<tr>
<td>Complexity</td>
<td>Notional amount of over-the-counter (OTC) derivatives</td>
<td>3,833,443</td>
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<td>Trading and available-for-sale securities</td>
<td>14,866</td>
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<td>Level 3 assets</td>
<td>4,768</td>
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<tr>
<td>Cross-jurisdictional activity</td>
<td>Cross-jurisdictional claims</td>
<td>749,176</td>
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<tr>
<td></td>
<td>Cross-jurisdictional liabilities</td>
<td>617,677</td>
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</table>
End-2019 G-SiB Assessment Exercise

General Bank Data

<table>
<thead>
<tr>
<th>Section</th>
<th>General Information</th>
<th>GSB</th>
<th>Response</th>
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<tbody>
<tr>
<td>a.</td>
<td>General information provided by the relevant supervisory authority:</td>
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<td>NL</td>
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<tr>
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<td>Country code</td>
<td>1002</td>
<td>ING Groep N.V.</td>
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<td>Bank name</td>
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<td>(3)</td>
<td>Reporting date (yyyy-mm-dd)</td>
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<td>(4)</td>
<td>Reporting currency</td>
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<td>(5)</td>
<td>Total conversion rate</td>
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<tr>
<td>(6)</td>
<td>Submission date (yyyy-mm-dd)</td>
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<td>b.</td>
<td>General information provided by the reporting institution:</td>
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<td>IFRS</td>
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<td>Reporting unit</td>
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<td>(2)</td>
<td>Accounting standard</td>
<td>1010</td>
<td><a href="https://www.ing.com/investor">https://www.ing.com/investor</a></td>
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<td>(3)</td>
<td>Data of public disclosure (yyyy-mm-dd)</td>
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<td>(4)</td>
<td>Language of public disclosure</td>
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<td>Website of public disclosure</td>
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Size Indicator

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<tr>
<th>Section</th>
<th>Total Exposures</th>
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<td>a.</td>
<td>Derivatives</td>
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<td>Counterparty exposure of derivatives contracts</td>
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<td>(2)</td>
<td>Capped notional amount of credit derivatives</td>
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<td>13,404</td>
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<td>(3)</td>
<td>Potential future exposure of derivative contracts</td>
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<td>b.</td>
<td>Securities financing transactions (SFTs)</td>
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<td>18,357</td>
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<td>(1)</td>
<td>Adjusted gross value of SFTs</td>
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<td>10,259</td>
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<tr>
<td>(2)</td>
<td>Counterparty exposure of SFTs</td>
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<td>18,357</td>
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<td>c.</td>
<td>Other assets</td>
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<td>6,935</td>
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<td>(1)</td>
<td>Gross notional amount of off-balance sheet items</td>
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<td>10,735</td>
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<td>Items subject to a 0% credit conversion factor (CCF)</td>
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<td>(3)</td>
<td>Items subject to a 20% CCF</td>
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<td>Items subject to a 50% CCF</td>
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<td>Regulatory adjustments</td>
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<td>4,435</td>
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<td>f.</td>
<td>Total exposures indicator (Total exposures prior to regulatory adjustments) (sum of items 2.a.1 (1) through 2.c.1 (2), 0.1 times 2.d. (1), 0.2 times 2.d. (2), 0.5 times 2.d. (3), and 2.d. (4))</td>
<td>1025</td>
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Interconnectedness Indicators

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<thead>
<tr>
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<th>Intra-Financial System Assets</th>
<th>GSB</th>
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<tr>
<td>a.</td>
<td>Funds deposited with or lent to other financial institutions</td>
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<td>63,889</td>
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<td>(1)</td>
<td>Certificates of deposit</td>
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<td>b.</td>
<td>Unused portion of committed lines extended to other financial institutions</td>
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<td>25,583</td>
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<td>c.</td>
<td>Holdings of securities issued by other financial institutions</td>
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<td>9,765</td>
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<tr>
<td>(1)</td>
<td>Secured debt securities</td>
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<td>12,356</td>
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<td>(2)</td>
<td>Senior unsecured debt securities</td>
<td>1037</td>
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<td>(3)</td>
<td>Subordinated debt securities</td>
<td>1038</td>
<td>83</td>
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<td>(4)</td>
<td>Commercial paper</td>
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<td>(5)</td>
<td>Equity securities</td>
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<td>4,352</td>
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<td>(6)</td>
<td>Offsetting short positions in relation to the specific equity securities included in item 3.c. (5)</td>
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<td>28,657</td>
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<td>d.</td>
<td>Net positive current exposures of securities financing transactions with other financial institutions</td>
<td>1042</td>
<td>9,329</td>
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<td>(1)</td>
<td>Over-the-counter derivatives with other financial institutions that have a net positive fair value</td>
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<td>3,820</td>
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<td>e.</td>
<td>Intra-financial system assets indicator (sum of items 3.a, 3.b through 3.c. (5), 3.d. e (1), and 3.d. e (2), minus 3.c. (5))</td>
<td>1044</td>
<td>145,109</td>
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<table>
<thead>
<tr>
<th>Section</th>
<th>Intra-Financial System Liabilities</th>
<th>GSB</th>
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<tr>
<td>a.</td>
<td>Funds deposited by or borrowed from other financial institutions:</td>
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<td>28,956</td>
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<tr>
<td>(1)</td>
<td>Deposits due to depository institutions</td>
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<td>28,956</td>
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<td>(2)</td>
<td>Deposits due to non-depository financial institutions</td>
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<td>78,311</td>
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<td>(3)</td>
<td>Loans obtained from other financial institutions</td>
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<td>b.</td>
<td>Unused portion of committed lines obtained from other financial institutions</td>
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<td>c.</td>
<td>Net negative current exposure of securities financing transactions with other financial institutions</td>
<td>1050</td>
<td>2,558</td>
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<td>(1)</td>
<td>Net negative fair value</td>
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<td>(2)</td>
<td>Potential future exposure</td>
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<td>e.</td>
<td>Intra-financial system liabilities indicator (sum of items 4.a. (1) through 4.d. (2))</td>
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### Section 5 - Securities Outstanding

<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>GSEB</th>
<th>Amount in million EUR</th>
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<tbody>
<tr>
<td>a.</td>
<td>Secured debt securities</td>
<td>1053</td>
<td>33,691</td>
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<td>b.</td>
<td>Senior unsecured debt securities</td>
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<td>51,894</td>
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<td>c.</td>
<td>Subordinated debt securities</td>
<td>1055</td>
<td>13,113</td>
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<td>d.</td>
<td>Commercial paper</td>
<td>1056</td>
<td>28,929</td>
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<td>e.</td>
<td>Certificates of deposit</td>
<td>1057</td>
<td>14,322</td>
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<td>f.</td>
<td>Common equity</td>
<td>1058</td>
<td>53,769</td>
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<td>g.</td>
<td>Preferred shares and any other forms of subordinated funding not captured in</td>
<td>1059</td>
<td>3,475</td>
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<td>h.</td>
<td>Securities outstanding indicator (sum of items a through g)</td>
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<td>187,164</td>
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### Substitutability/Financial Institution Infrastructure Indicators

<table>
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<th>Item</th>
<th>Description</th>
<th>GSEB</th>
<th>Amount in million EUR</th>
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<tbody>
<tr>
<td>a.</td>
<td>Australian dollars (AUD)</td>
<td>1061</td>
<td>213,455</td>
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<td>b.</td>
<td>Brazilian real (BRL)</td>
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<td>c.</td>
<td>Canadian dollars (CAD)</td>
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<td>206,364</td>
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<td>d.</td>
<td>Swiss francs (CHF)</td>
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<td>964,612</td>
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<td>e.</td>
<td>Chinese yuan (CNY)</td>
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<td>Euros (EUR)</td>
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<td>g.</td>
<td>British pounds (GBP)</td>
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<td>1,575,173</td>
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<td>h.</td>
<td>Hong Kong dollars (HKD)</td>
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<td>341,724</td>
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<td>i.</td>
<td>Indian rupee (INR)</td>
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<td>j.</td>
<td>Japanese yen (JPY)</td>
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<td>k.</td>
<td>Mexican pesos (MXN)</td>
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<td>136,637</td>
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<td>l.</td>
<td>Swedish krona (SEK)</td>
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<td>113,516</td>
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<td>m.</td>
<td>United States dollars (USD)</td>
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<td>59,238,586</td>
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<td>Payments activity indicator (sum of items 6.6 through 6.9)</td>
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### Section 7 - Assets Under Custody

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<td>a.</td>
<td>Assets under custody indicator</td>
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### Section 8 - Underwritten Transactions in Debt and Equity Markets

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<tr>
<td>a.</td>
<td>Equity underwriting activity</td>
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<td>b.</td>
<td>Debt underwriting activity</td>
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<td>37,497</td>
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<td>Underwriting activity indicator (sum of items 8.a and 8.b)</td>
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### Complexity indicators

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<tbody>
<tr>
<td>a.</td>
<td>OTC derivatives cleared through a central counterparty</td>
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<td>b.</td>
<td>OTC derivatives indicator (sum of items 9.a and 9.b)</td>
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<td>OTC derivatives indicator (sum of items 9.a and 9.b)</td>
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### Section 10 - Trading and Available-for-Sale Securities

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<th>Description</th>
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<tbody>
<tr>
<td>a.</td>
<td>Held-for-trading securities (HFT)</td>
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<td>b.</td>
<td>Available-for-sale securities (AFS)</td>
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<td>c.</td>
<td>Trading and AFS securities that meet the definition of Level 1 assets</td>
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<td>74,569</td>
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<td>d.</td>
<td>Trading and AFS securities that meet the definition of Level 2 assets, with</td>
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<td>7,451</td>
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<td>haircuts</td>
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<td>e.</td>
<td>Trading and AFS securities indicator (sum of items 10.a and 10.b, minus the</td>
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<td>sum of 10.c and 10.d)</td>
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### Section 11 - Level 3 Assets

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<tr>
<td>a.</td>
<td>Level 3 assets indicator (Assets valued for accounting purposes using Level 3</td>
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### Cross-Jurisdictional Activity Indicators

<table>
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<tbody>
<tr>
<td>a.</td>
<td>Cross-Jurisdictional claims indicator (Total foreign claims on an ultimate</td>
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<td>risk basis)</td>
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<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>GSEB</th>
<th>Amount in million EUR</th>
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</thead>
<tbody>
<tr>
<td>a.</td>
<td>Cross-Jurisdictional liabilities indicator (Foreign liabilities excluding</td>
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<td>derivatives and local liabilities in local currency)</td>
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<td>b.</td>
<td>Local liabilities in local currency (excluding derivatives activity)</td>
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<td>429,775</td>
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<td>Cross-jurisdictional liabilities indicator (sum of items 13.a and 13.b,</td>
<td>1091</td>
<td>817,877</td>
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<td>minus 13.a (1))</td>
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<table>
<thead>
<tr>
<th>Item</th>
<th>Description</th>
<th>GSEB</th>
<th>Amount in million EUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>a.</td>
<td>Cross-Jurisdictional claims indicator (Total foreign claims on an ultimate</td>
<td>1087</td>
<td>749,176</td>
</tr>
<tr>
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<td>risk basis)</td>
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