

2010 RISK & CAPITAL REPORT

Incorporating the requirements of APS 330

Half Year Update

31 March 2010

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Scope of Application

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1. APS 330 Disclosure

Australian Prudential Regulation Authority (“APRA”) has prudential oversight of the operations of all locally incorporated ADIs in Australia. This Risk and Capital Report addresses the requirements of APRA’s Pillar 3 public disclosure standard, *Prudential Standard APS 330 Capital Adequacy: Public Disclosure of Prudential Information* (“APS 330”) for the six months ended 31 March 2010.

All figures are in Australian dollars (“AUD”) unless otherwise noted.

The Group’s Basel II Methodologies

The Group, as defined in Section 2 ‘Scope of Application’, operates in multiple regulatory jurisdictions. The following table sets out the methodologies applied across the Group as at 31 March 2010.

Basel II Approach	Credit Risk	Operational Risk	Non Traded Market Risk	Traded Market Risk
National Australia Bank Limited	Advanced IRB	AMA	IRRBB	Standardised and IMA
Bank of New Zealand	Advanced IRB	AMA	IRRBB	n/a
Clydesdale Bank PLC	Standardised	Standardised	IRRBB	n/a
Great Western Bank	Basel I	n/a	n/a	n/a

IRB: Internal Ratings Based approach
AMA: Advanced Measurement Approach
IRRBB: Interest Rate Risk in the Banking Book
IMA: Internal Models Approach

Bank of New Zealand credit risk exposures consolidated in the Banking Group position are calculated under Reserve Bank of New Zealand (“RBNZ”) requirements as mandated by APRA.

Great Western Bank is regulated by the South Dakota Division of Banking, the Federal Deposit Insurance Corporation and the Federal Reserve Bank. Great Western Bank is reported under ‘Standardised – Other’ for the purposes of calculating the consolidated banking group position.

Disclosure Governance

The Group’s external disclosure policy defines Board and management accountabilities for APS 330 disclosure, including processes and practices to ensure the integrity and timeliness of prudential disclosures and compliance with Group policies.

The National Australia Bank Group’s Chief Executive Officer attests to the reliability of the Group’s APS 330 disclosure within the annual declaration provided to APRA under *Prudential Standard APS 310 Audit and Related Matters*.

Disclosure controls and procedures have been designed and implemented to effectively manage prudential reporting risk.

Regulatory Reform

In December 2009, the Basel Committee released its proposals for wide ranging regulatory reform of the capital and liquidity framework and has since received comprehensive industry and market feedback. While the reforms are yet to be finalised, they propose a number of changes including:

- Higher levels of better quality capital and liquid assets to be held across the industry;
- Increased deductions from Fundamental Tier 1;
- The use of a leverage ratio as a secondary measure;
- Measures to reduce capital pro-cyclicality including counter cyclical buffers;
- Narrower definition of qualifying liquid assets with preference for sovereign debt;
- A Liquidity Coverage Ratio requiring a substantial increase in liquid assets; and
- A Net Stable Funding Ratio, which would substantially increase the stable funding (deposits and funding with a term > 12 months) required to support bank assets.

Prudential standards are targeted to be released by the end of 2010 with implementation by 2012. The standards are conservatively positioned, and the timeline very tight, with some potential for changes following the global quantitative impact study (QIS).

APRA has also released its revisions to the existing prudential framework for market risk and securitisation, with implementation due in January 2011, as well as its proposals for supervision on conglomerate groups (Level 3 framework) with implementation expected in 2012.

In the current environment, regulatory reform is expected to continue to evolve in these and in other areas as global regulators seek to address risks highlighted through the global financial crisis.

2. Scope of Application

As required under APS 330, this disclosure applies to the Level 2 consolidated Group, being the National Australia Bank Limited (“the Company”) and the entities it controls subject to certain exceptions set out in this part (“the Group”).

The controlled entities in the Group include banking entities (Bank of New Zealand, Clydesdale Bank PLC and Great Western Bank), and other financial entities (e.g. finance companies and leasing companies).

Under guidelines issued by APRA, life insurance and funds management entities activities are excluded from the calculation of Basel II risk weighted assets and the related controlled entities are deconsolidated from the National Australia Bank Group for the purposes of calculating capital adequacy. Capital adequacy deductions are applied to the investments in, and profits of, these activities.

In addition, certain securitisation special purpose vehicles (“SPVs”) to which assets have been transferred in accordance with APRA’s requirements as set out in *Prudential Standard APS 120: Securitisation* (“APS 120”) have been deconsolidated from the National Australia Bank Group for the purposes of this disclosure. For regulatory purposes, credit risk is removed from the sold assets, and there is no requirement to hold capital against them.

Differences arising in consolidation between Regulatory and Accounting approaches

The primary difference in consolidation between the regulatory approach and the accounting approach as defined by the Australian equivalents to the International Financial Reporting Standards (“AIFRS”) is the area of investments in life insurance, funds management and securitisation. Under AIFRS, all entities, including SPVs, where the National Australia Bank Group has the power to govern the financial and operating policies so as to obtain benefit from their activities, are consolidated. This includes life insurance, funds management and SPVs used to house assets securitised. A list of material controlled entities included in the consolidated National Australia Bank Group for accounting purposes can be found in the National Australia Bank Group’s 30 September 2009 financial report.

Restrictions on the transfer of funds or regulatory capital within the National Australia Bank Group

The transfer of regulatory capital and funding within the National Australia Bank Group is subject to restrictions imposed by National Australia Bank Group or local regulatory requirements as reflected in internal policies.

Further, for funding transfers within the National Australia Bank Group, *APS 222: Associations with Related Entities* establishes limits on the level of exposure (for example debt and equity) that the Company may have to a related entity. National Australia Bank Group policy requires compliance with these limits and that the Company takes account of risks associated with dealings with other members of the National Australia Bank Group.

Table 2A: Scope of Application

Capital deficiencies in non-consolidated subsidiaries	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Aggregate amount of under capitalisation in non-consolidated subsidiaries of the ADI group	-	-

Clydesdale Bank PLC

Clydesdale Bank PLC has made use of the provisions laid down in BIPRU 2.1 (Solo Consolidation Waiver). This enables some intra group exposures and investments of Clydesdale Bank PLC in its subsidiaries to be eliminated and the free reserves of such subsidiaries to be aggregated, when calculating capital resource requirements of Clydesdale Bank PLC.

BNZ

Bank of New Zealand (“BNZ”) is a wholly owned subsidiary of National Australia Bank Limited and operates as a regionally autonomous, full-service bank in New Zealand. The BNZ Board is responsible for corporate governance and derives its authority from the Constitution of Bank of New Zealand and applicable New Zealand legislation.

BNZ is subject to the capital adequacy requirements applicable in New Zealand, mandated by the Reserve Bank of New Zealand (RBNZ). The capital ratios for BNZ presented in this report have been derived under the RBNZ’s Capital Adequacy Framework (Internal Models Approach). Full Basel II based disclosures are published separately under the General Disclosure Statement regime applicable to banks incorporated in New Zealand.

3. Capital

3.1 Capital Adequacy

Table 3.1A: Capital Adequacy

The following table provides the Basel II risk weighted assets ("RWA") for the Group.

	As at	
	31 Mar 10	30 Sep 09
	RWA	RWA
	\$m	\$m
Credit risk ⁽¹⁾		
IRB approach		
Corporate (including SME) ⁽²⁾	124,314	137,460
Sovereign ⁽³⁾	957	1,041
Bank ^{(4) (5)}	5,560	6,914
Residential mortgage ^{(4) (6)}	45,932	47,924
Qualifying revolving retail ⁽⁴⁾	4,110	4,031
Retail SME ⁽⁷⁾	7,973	6,994
Other retail	3,879	3,916
Total IRB approach	192,725	208,280
Specialised lending (SL) ⁽²⁾	30,038	23,218
Standardised approach		
Australian and foreign governments	41	91
Bank ⁽⁵⁾	312	777
Residential mortgage ⁽⁶⁾	22,910	20,336
Corporate	28,491	32,465
Other	7,926	8,799
Total standardised approach	59,680	62,468
Other		
Securitisation	12,048	10,968
Equity	1,261	1,030
Other ⁽⁹⁾	5,721	6,011
Total other	19,030	18,009
Total credit risk	301,473	311,975
Market risk ⁽¹⁰⁾	3,305	3,415
Operational risk	22,402	22,972
Interest rate risk in the banking book	5,653	4,160
Total risk weighted assets	332,833	342,522

⁽¹⁾ RWA, which are calculated in accordance with APRA's requirements under Basel II, are required to incorporate a scaling factor of 1.06 to assets that are not subject to specific risk weights.

⁽²⁾ As part of an ongoing industry review with APRA, changes to the classification of the commercial property portfolio meeting the slotting criteria were introduced in the December 2009 quarter. This resulted in a reclassification of Corporate exposures to Specialised Lending (Income Producing Real Estate), resulting in a net increase to RWA of approximately \$3.8 billion. Specialised Lending exposures are subject to slotting criteria.

⁽³⁾ Sovereign includes government guaranteed exposures.

⁽⁴⁾ For IRB approach: 'Bank' includes ADIs, overseas banks and non-commercial public sector entities. 'Residential mortgage' includes exposures that are partly or fully secured by residential properties. 'Qualifying revolving retail' exposures are revolving, unsecured and unconditionally cancellable (both contractually and in practice), for individuals and not explicitly for business purposes.

⁽⁵⁾ As at 31 March 2010 the Group held \$5.6 billion (September 2009: \$4.1 billion) of government guaranteed Financial Institution Debt. This resulted in the application of lower risk weights on these holdings with a reduction in RWA of \$1.4 billion (September 2009: \$1.8 billion) and an effective increase in Tier 1 capital ratio 0.04% (September 2009: 0.05%) and Total capital ratio of 0.05% (September 2009: 0.06%). This debt is assessed in accordance with normal credit approval processes. While the Australian government guarantee shall remain for existing Financial Institution Debt guaranteed under the scheme, this arrangement was revoked by the Australian Government for new issuance from 31 March 2010.

⁽⁶⁾ As at January 2010 the Group implemented a new National Portfolio Facility Probability of Default ("PD") model. This resulted in a net decrease to RWA of approximately \$1.7 billion.

⁽⁷⁾ Effective 1 October 2009 the Group received approval from RBNZ to segment the BNZ retail SME portfolio classification (which was previously included in the Group's Corporate Portfolio).

⁽⁸⁾ 31 March 2010 includes the Advantedge portfolio (formally Challenger Mortgage Management business).

⁽⁹⁾ 'Other' includes non-lending asset exposures. Non-lending assets are specifically excluded from credit risk exposures shown on pages 9 to 30 of this report.

⁽¹⁰⁾ APRA approved the Group's use of the Internal Model Approach to calculate regulatory capital relating to commodities trading (this was previously calculated under the Standard Method). This approval became effective from January 2010. The net impact of this change was not material relative to total Group RWA.

Table 3.1B: Capital Ratios

The table below provides the key capital ratios defined in APS 330. Capital ratios for offshore banking subsidiaries reflect host regulator discretions. Clydesdale Bank PLC and Bank of New Zealand capital ratios are assessed on a consolidated basis in line with the local regulatory framework.

Capital ratios ⁽¹⁾	As at	
	31 Mar 10	30 Sep 09
	%	%
Level 2 total capital ratio	12.07%	11.48%
Level 2 Tier 1 capital ratio	9.09%	8.96%
Level 1 National Australia Bank total capital ratio	13.58%	13.23%
Level 1 National Australia Bank Tier 1 capital ratio	10.71%	10.76%
Significant subsidiaries		
Clydesdale Bank PLC total capital ratio	13.96%	13.14%
Clydesdale Bank PLC Tier 1 capital ratio	8.82%	8.15%
Bank of New Zealand total capital ratio	12.03%	10.88%
Bank of New Zealand Tier 1 capital ratio	9.03%	8.08%
Great Western Bank total capital ratio	11.56%	11.55%
Great Western Bank Tier 1 capital ratio	10.58%	10.58%

⁽¹⁾ Level 1 group represents the extended license entity. The Level 2 group represents the consolidation of Group and all its subsidiary entities, other than non-consolidated subsidiaries as outlined within Section 2 'Scope of Application' of this report.

3.2 Capital Structure

Table 3.2A: Capital Structure ⁽¹⁾

	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Tier 1 capital		
Paid-up ordinary share capital	19,657	19,119
Reserves	(1,748)	(1,098)
Retained earnings including current year earnings	14,210	14,769
Minority interests	22	20
Innovative Tier 1 capital	4,506	4,601
Non-innovative Tier 1 capital	2,740	2,738
Gross Tier 1 capital	39,387	40,149
Deductions from Tier 1 capital		
Banking goodwill	1,680	1,694
Wealth management goodwill and other intangibles	4,307	4,211
Deferred tax assets	1,008	1,209
Other deductions from Tier 1 capital only	1,008	886
50/50 deductions from Tier 1 capital		
Investment in non-consolidated controlled entities	891	881
Expected loss in excess of eligible provisions	96	355
Deductions relating to securitisation	145	239
Total Tier 1 capital deductions	9,135	9,475
Net Tier 1 capital	30,252	30,674
Tier 2 capital		
Upper Tier 2 capital	965	822
Lower Tier 2 capital	10,176	9,371
Gross Tier 2 capital	11,141	10,193
Deductions from Tier 2 capital		
Deductions from Tier 2 capital only	75	75
50/50 deductions from Tier 2 capital		
Investment in non-consolidated controlled entities	891	881
Expected loss in excess of eligible provisions	96	355
Deductions relating to securitisation	145	239
Total Tier 2 capital deductions	1,207	1,550
Net Tier 2 capital	9,934	8,643
Total capital	40,186	39,317

⁽¹⁾ Regulatory Capital has been calculated in accordance with APRA definitions in Prudential Standard APS 111 Capital Adequacy: Measurement of Capital. The regulatory approach to calculating capital differs from the accounting approach as defined under AIFRS.

4. Risk Exposure and Assessment

The effective management of risk is essential to the strategy and business practices of a bank. The Group's approach to risk management is through the consideration of the key risk categories of credit risk, operational risk, traded market risk and balance sheet related risks including non-traded market risk.

The following sections of this report provide information on the Group's risk exposures, as required by APS 330:

- Section 5.1 Credit Risk General Disclosure presents detailed information on the Group's credit risk exposure, including impaired facilities, past due facilities, specific provisions, write-offs and the general reserve for credit losses;
- Section 5.2 Credit Risk Standardised and Supervisory Slotting Portfolios presents detailed information on the Group's exposures in each portfolio by risk weight;
- Section 5.3 Credit Risk Internal Ratings Based ("IRB") Portfolios presents detailed information on Probability of Default ("PD"), Loss Given Default ("LGD") and average risk grades across the Group's IRB portfolio;
- Section 5.4 Credit Risk Mitigation presents detailed information on the Group's credit risk exposures covered by eligible financial collateral, guarantees and credit derivatives;
- Section 6 Securitisation presents detailed information on third party securitisation exposures which are undertaken for business purposes, as well as securitisation of the Group's own assets, undertaken for funding, liquidity, risk and capital management purposes;
- Section 7 Market Risk presents detailed information on the Group's portfolios subject to the Standard Method and Internal Model Approaches, including Value at Risk estimates used in the regulatory capital calculation;
- Section 8 Operational Risk presents a breakdown of risk weighted assets, split between portfolios subject to the Standardised and Advanced Measurement Approaches;
- Section 9.1 Equity Risk presents detailed information on the value of investments disclosed in the balance sheet, as well as any gains or losses on those equity investments; and
- Section 9.2 Interest Rate Risk in the Banking Book presents information on the impact to economic value as a result of upward or downward interest rate shocks.

More detailed qualitative and quantitative disclosure of the Group's approach to risk management and assessment of overall capital adequacy for the year ended 30 September 2009 are available on the National Australia Bank Group's website (www.nabgroup.com).

5. Credit Risk

5.1 General Disclosure

Table 5.1A: Credit Risk Exposures Summary

This table provides the amount of gross credit risk exposure subject to the Standardised and Advanced IRB approaches, excluding non-lending assets, equities and securitisation. The Group has no credit risk exposure subject to the Foundation IRB approach. Gross credit risk exposure refers to the potential exposure as a result of a counterparty default prior to the application of credit risk mitigation and is defined to be the outstanding amount on drawn commitments plus a credit conversion factor on undrawn commitments on a given facility. For derivatives, the exposure is defined as the mark-to-market value plus a potential value of future movements.

For the IRB approach, Exposure at Default ("EaD") is reported gross of specific provisions, partial write-offs and prior to the application of on-balance sheet netting and credit risk mitigation. For the Standardised approach, EaD is reported net of any specific provision and prior to the application of on-balance netting and credit risk mitigation.

Exposure Type	As at 31 Mar 10					6 months ended
	Total exposure (EaD) ⁽¹⁾	Risk weighted assets	Regulatory expected loss	Impaired facilities ⁽²⁾	Specific provisions ⁽³⁾	Write-offs ⁽⁴⁾
	\$m	\$m	\$m	\$m	\$m	\$m
IRB approach						
Corporate (including SME)	179,582	124,314	2,934	2,719	908	450
Sovereign	22,193	957	2	-	-	-
Bank	68,969	5,560	83	39	39	29
Residential mortgage	213,635	45,932	740	692	144	48
Qualifying revolving retail	10,120	4,110	234	-	-	101
Retail SME	16,949	7,973	312	170	95	38
Other retail	4,756	3,879	186	11	7	57
Total IRB approach	516,204	192,725	4,491	3,631	1,193	723
Specialised lending (SL)	35,485	30,038	1,032	908	205	-
Standardised approach						
Australian and foreign governments	2,765	41	-	-	-	-
Bank	11,199	312	-	-	-	-
Residential Mortgage	38,850	22,910	-	54	11	6
Corporate	30,194	28,491	-	1,128	156	186
Other	7,915	7,926	-	80	16	105
Total standardised approach	90,923	59,680	-	1,262	183	297
Total	642,612	282,443	5,523	5,801	1,581	1,020
Additional regulatory specific provisions ⁽³⁾					572	
General reserve for credit losses ⁽⁵⁾					2,820	

⁽¹⁾ Total credit risk exposure is EaD estimates of potential exposure, according to product type, for a period of 1 year.

⁽²⁾ Impaired facilities include \$465 million of restructured loans (September 2009: \$384 million). These loans represent facilities that have been classified as restructured for reasons relating to the financial difficulty of the counterparty but exclude \$281 million of facilities (September 2009: \$312 million) which have been classified as restructured for reasons which do not relate to the financial difficulty of the counterparty.

Impaired facilities also include \$344 million of gross impaired fair value assets (September 2009: \$366 million).

⁽³⁾ Specific provisions for prudential purposes include all provisions for impairment assessed on an individual basis in accordance with AIFRS excluding securitisation. All collective provisions on defaulted or otherwise non-performing assets, regardless of expected loss, such as those for 90+ days past due retail and in default with no loss non-retail exposures, have been reported as additional regulatory specific provisions and shown in this report as a separate item.

Specific provisions include \$111 million (September 2009: \$98 million) of gross impaired fair value assets.

⁽⁴⁾ Write-offs are net of recoveries.

⁽⁵⁾ The general reserve for credit losses ("GRCL") at 31 March 2010 is calculated as follows:

	\$m
Collective provision for doubtful debts	3,610
Less collective provisions for securitisation and management overlay for conduit assets and derivatives	(190)
Less collective provisions reported as additional regulatory specific provisions	(572)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (pre-tax basis)	2,848
Less tax effect	(766)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (after-tax basis)	2,082
Plus reserve created through a deduction from retained earnings	738
General reserve for credit losses (after-tax basis)	2,820

Exposure Type	As at 30 Sep 09					6 months ended 30 Sep 09
	Total exposure (EaD) \$m	Risk weighted assets \$m	Regulatory expected loss \$m	Impaired facilities \$m	Specific provisions \$m	Write-offs \$m
IRB approach						
Corporate (including SME)	195,289	137,460	2,950	2,962	1,117	714
Sovereign	13,559	1,041	3	-	-	-
Bank	61,697	6,914	83	-	-	-
Residential mortgage	208,419	47,924	734	750	137	118
Qualifying revolving retail	9,987	4,031	221	-	-	63
Retail SME	15,171	6,994	252	124	66	23
Other retail	4,806	3,916	182	11	6	80
Total IRB approach	508,928	208,280	4,425	3,847	1,326	998
Specialised lending (SL)	26,678	23,218	665	397	25	32
Standardised approach						
Australian and foreign governments	5,827	91	-	-	-	-
Bank	13,391	777	-	-	-	-
Residential Mortgage	31,633	20,336	-	52	17	7
Corporate	34,798	32,465	-	1,091	154	363
Other	8,767	8,799	-	49	20	149
Total standardised approach	94,416	62,468	-	1,192	191	519
Total	630,022	293,966	5,090	5,436	1,542	1,549
Additional regulatory specific provisions					529	
General reserve for credit losses ⁽¹⁾					2,834	

⁽¹⁾ Changes to the calculation of the GRCL were effective 31 December 2009. The GRCL at 30 September 2009 was calculated as follows:

	\$m
Collective provision for doubtful debts	3,553
Less collective provisions for securitisation and management overlay for conduit assets and derivatives	(190)
Less collective provisions reported as additional regulatory specific provisions	(529)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (pre-tax basis)	<u>2,834</u>

Credit Exposures by Measurement Approach

Table 5.1B: Total Gross Credit Risk Exposures

This table provides the amount of credit risk exposure subject to the Standardised and Advanced IRB approaches, excluding non-lending assets, equities and securitisation. The Group has no credit risk exposure subject to the Foundation IRB approach.

Exposure type	As at 31 Mar 10			
	On-balance sheet exposure	Non-market related off-balance sheet	Market related off-balance sheet	Total exposures
	\$m	\$m	\$m	\$m
IRB approach				
Corporate (including SME)	124,329	41,410	13,843	179,582
Sovereign	12,968	731	8,494	22,193
Bank	20,830	1,559	46,580	68,969
Residential mortgage	181,872	31,763	-	213,635
Qualifying revolving retail	5,158	4,962	-	10,120
Retail SME	13,775	3,174	-	16,949
Other retail	3,494	1,262	-	4,756
Total IRB approach	362,426	84,861	68,917	516,204
Specialised lending (SL)	30,411	4,384	690	35,485
Standardised approach				
Australian and foreign governments	2,588	177	-	2,765
Bank	5,903	334	4,962	11,199
Residential mortgage	36,578	2,272	-	38,850
Corporate	25,368	4,138	688	30,194
Other	7,594	321	-	7,915
Total standardised approach	78,031	7,242	5,650	90,923
Total exposure (EaD)	470,868	96,487	75,257	642,612

Exposure type	As at 30 Sep 09			
	On-balance sheet exposure	Non-market related off-balance sheet	Market related off-balance sheet	Total exposure
	\$m	\$m	\$m	\$m
IRB approach				
Corporate (including SME)	138,160	42,162	14,967	195,289
Sovereign	9,410	1,429	2,720	13,559
Bank	22,940	1,709	37,048	61,697
Residential mortgage	176,533	31,886	-	208,419
Qualifying revolving retail	4,955	5,032	-	9,987
Retail SME	12,009	3,162	-	15,171
Other retail	3,502	1,304	-	4,806
Total IRB approach	367,509	86,684	54,735	508,928
Specialised lending (SL)	21,778	4,118	782	26,678
Standardised approach				
Australian and foreign governments	5,529	224	74	5,827
Bank	9,320	370	3,701	13,391
Residential mortgage	29,327	2,306	-	31,633
Corporate	29,569	4,487	742	34,798
Other	8,330	437	-	8,767
Total standardised approach	82,075	7,824	4,517	94,416
Total exposure (EaD)	471,362	98,626	60,034	630,022

Table 5.1C: Average Credit Risk Exposures

This table provides the average credit risk exposure, being the sum of the gross credit risk exposure at the beginning of the reporting period plus the gross credit risk exposure at the end of the reporting period divided by two.

Exposure type	6 months ended 31 Mar 10			Average total exposure \$m
	On-balance sheet exposure \$m	Non-market related off-balance sheet \$m	Market related off-balance sheet \$m	
IRB approach				
Corporate (including SME)	131,245	41,786	14,405	187,436
Sovereign	11,189	1,080	5,607	17,876
Bank	21,885	1,634	41,814	65,333
Residential mortgage	179,202	31,825	-	211,027
Qualifying revolving retail	5,056	4,997	-	10,053
Retail SME	12,892	3,168	-	16,060
Other retail	3,498	1,283	-	4,781
Total IRB approach	364,967	85,773	61,826	512,566
Specialised lending (SL)	26,095	4,251	736	31,082
Standardised approach				
Australian and foreign governments	4,058	201	37	4,296
Bank	7,612	352	4,331	12,295
Residential mortgage	32,952	2,289	-	35,241
Corporate	27,469	4,312	715	32,496
Other	7,962	379	-	8,341
Total standardised approach	80,053	7,533	5,083	92,669
Total exposure (EaD)	471,115	97,557	67,645	636,317

Exposure type	6 months ended 30 Sep 09			Average total exposure \$m
	On-balance sheet exposure \$m	Non-market related off-balance sheet \$m	Market related off-balance sheet \$m	
IRB approach				
Corporate (including SME)	147,141	45,681	16,692	209,514
Sovereign	4,705	714	1,360	6,779
Bank	23,285	2,019	39,736	65,040
Residential mortgage	173,902	30,989	-	204,891
Qualifying revolving retail	5,410	5,382	-	10,792
Retail SME	6,005	1,581	-	7,586
Other retail	3,014	895	-	3,909
Total IRB approach	363,462	87,261	57,788	508,511
Specialised lending (SL)	21,333	4,147	1,162	26,642
Standardised approach				
Australian and foreign governments	11,026	491	2,300	13,817
Bank	10,422	396	3,524	14,342
Residential mortgage	30,538	1,908	-	32,446
Corporate	31,447	5,026	849	37,322
Other	8,962	574	-	9,536
Total standardised approach	92,395	8,395	6,673	107,463
Total exposure (EaD)	477,190	99,803	65,623	642,616

Table 5.1D: Exposures by Geography

This table provides the total on- and off-balance sheet gross credit risk exposure, excluding non-lending assets, equities and securitisation, for the Standardised and Advanced IRB portfolios, by major geographical areas, derived from the booking office where the exposure was transacted.

Exposure type	As at 31 Mar 10				
	Australia \$m	Europe \$m	New Zealand \$m	Other ⁽¹⁾ \$m	Total exposure \$m
IRB approach					
Corporate (including SME)	135,054	14,926	24,994	4,608	179,582
Sovereign	16,190	582	2,720	2,701	22,193
Bank	40,739	20,347	3,181	4,702	68,969
Residential mortgage	191,605	-	22,030	-	213,635
Qualifying revolving retail	10,120	-	-	-	10,120
Retail SME	15,349	-	1,600	-	16,949
Other retail	2,729	-	2,027	-	4,756
Total IRB approach	411,786	35,855	56,552	12,011	516,204
Specialised lending (SL)	31,706	1,140	850	1,789	35,485
Standardised approach					
Australian and foreign governments	-	2,765	-	-	2,765
Bank	-	11,199	-	-	11,199
Residential mortgage	6,911	30,887	5	1,047	38,850
Corporate	6,393	23,729	21	51	30,194
Other	151	3,387	-	4,377	7,915
Total standardised approach	13,455	71,967	26	5,475	90,923
Total exposure (EaD)	456,947	108,962	57,428	19,275	642,612

⁽¹⁾ 'Other' comprises the United States of America and Asia.

Exposure type	As at 30 Sep 09				
	Australia \$m	Europe \$m	New Zealand \$m	Other \$m	Total exposure \$m
IRB approach					
Corporate (including SME)	144,945	16,726	28,151	5,467	195,289
Sovereign	10,604	68	50	2,837	13,559
Bank	30,997	21,687	3,055	5,958	61,697
Residential mortgage	185,274	-	23,145	-	208,419
Qualifying revolving retail	9,987	-	-	-	9,987
Retail SME	15,171	-	-	-	15,171
Other retail	2,724	-	2,082	-	4,806
Total IRB approach	399,702	38,481	56,483	14,262	508,928
Specialised lending (SL)	22,120	1,527	1,133	1,898	26,678
Standardised approach					
Australian and foreign governments	-	3,878	1,870	79	5,827
Bank	-	11,230	2,161	-	13,391
Residential mortgage	1,127	29,486	13	1,007	31,633
Corporate	6,182	28,539	24	53	34,798
Other	173	4,075	-	4,519	8,767
Total standardised approach	7,482	77,208	4,068	5,658	94,416
Total exposure (EaD)	429,304	117,216	61,684	21,818	630,022

Table 5.1E: Exposures by Industry

This table provides the distribution of gross credit risk exposure, excluding non-lending assets, equities and securitisation, by major industry type. Industry classifications follow ANZSIC Level 1 classifications.

Exposure type	As at 31 Mar 10												
	Accommodation cafes, pubs and restaurants	Agriculture, forestry, fishing and mining	Business services and property services	Commercial property	Construction	Finance and insurance ⁽¹⁾	Manufacturing	Personal mortgages	Retail and wholesale trade	Transport and storage	Other ⁽²⁾	Total	
	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m
IRB approach													
Corporate (including SME)	6,502	31,792	10,281	31,124	6,315	27,626	18,665	516	19,259	8,193	19,309	179,582	
Sovereign	-	-	-	-	-	10,787	-	-	-	-	11,406	22,193	
Bank	-	-	-	-	-	67,944	-	-	-	-	1,025	68,969	
Residential mortgage	-	-	-	-	-	-	-	10,120	-	-	-	213,635	
Qualifying revolving retail	-	-	-	-	-	-	-	-	-	-	-	10,120	
Retail SME	1,165	264	2,249	3,008	2,059	650	1,190	101	3,582	974	1,707	16,949	
Other retail	-	-	-	-	-	-	-	4,756	-	-	-	4,756	
Total IRB approach	7,667	32,056	12,530	34,132	8,374	107,007	19,855	15,493	22,841	9,167	33,447	516,204	
Specialised lending (SL)	-	128	239	29,375	220	506	237	-	-	944	3,836	35,485	
Standardised approach													
Australian and foreign governments	-	-	-	-	-	-	-	-	-	-	2,765	2,765	
Bank	-	-	-	-	-	11,199	-	-	-	-	-	11,199	
Residential mortgage	-	-	-	-	-	-	-	-	-	-	-	38,850	
Corporate ⁽³⁾	1,817	2,732	2,925	6,859	1,113	1,342	2,248	1,946	2,661	1,006	5,545	30,194	
Other	5	7	118	7	14	2	8	3,345	19	4	4,386	7,915	
Total standardised approach	1,822	2,739	3,043	6,866	1,127	12,543	2,256	5,291	2,680	1,010	12,696	90,923	
Total exposure (EaD)	9,489	34,923	15,812	70,373	9,721	120,056	22,348	20,784	25,521	11,121	49,979	642,612	

⁽¹⁾ In order to provide for a meaningful differentiation and quantitative estimate of risk that are consistent, verifiable, relevant and soundly based, 'Finance and Insurance' exposure is disclosed based on the counterparty to which the Group is exposed to for credit risk.

⁽²⁾ Immaterial categories are grouped collectively under 'Other'.

⁽³⁾ Under the Standardised approach, exposures secured by residential security have been reclassified from Commercial Property to Residential Mortgages since 30 September 2009, as part of a portfolio review of collateral.

As at 30 Sep 09

Exposure type	Accommodation		Agriculture, forestry, fishing and mining		Business services and property services		Commercial property		Construction		Finance and insurance		Manufacturing		Personal mortgages		Retail and wholesale trade		Transport and storage		Other		Total	
	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m	\$m		
IRB approach																								
Corporate (including SME)	6,436	31,780	10,886	42,729	6,463	29,846	20,137	675	-	19,634	8,138	18,665	195,289											
Sovereign	-	-	-	3,793	-	-	-	-	-	-	-	-	9,766	13,559										
Bank	-	-	-	-	-	59,304	-	-	-	-	-	2,393	61,697											
Residential mortgage	-	-	-	-	-	-	-	-	-	208,419	-	-	208,419											
Qualifying revolving retail	-	-	-	-	-	-	-	-	-	-	-	9,987	-	9,987										
Retail SME	1,056	175	2,112	2,518	1,887	592	1,082	1	-	3,401	820	1,527	15,171											
Other retail	-	-	-	-	-	-	-	-	-	4,806	-	-	4,806											
Total IRB approach	7,492	31,955	12,998	45,247	8,350	93,535	21,219	15,469	208,419	22,935	8,958	32,351	508,928											
Specialised lending (SL)	59	118	285	19,504	439	337	262	-	-	107	1,206	4,361	26,678											
Standardised approach																								
Australian and foreign governments	-	-	-	-	-	1,158	-	-	-	-	-	-	4,669	5,827										
Bank	-	-	-	-	-	13,391	-	-	-	-	-	-	13,391											
Residential mortgage	-	-	-	-	-	-	-	-	-	31,633	-	-	31,633											
Corporate	1,990	2,804	3,335	8,788	1,627	2,161	2,503	1,913	-	2,941	1,100	5,636	34,798											
Other	5	7	140	3	15	2	9	4,017	-	20	4	4,545	8,767											
Total standardised approach	1,995	2,811	3,475	8,791	1,642	16,712	2,512	5,930	31,633	2,961	1,104	14,850	94,416											
Total exposure (EaD)	9,546	34,884	16,758	73,542	10,431	110,584	23,993	21,399	240,052	26,003	11,268	51,562	630,022											

Table 5.1F: Exposures by Maturity

This table sets out the residual contractual maturity breakdown of gross credit risk exposure by Basel II asset class, excluding non-lending assets, equities and securitisation. Overdraft and other similar revolving facilities are allocated to the category that most appropriately captures the maturity characteristics of the product.

Exposure type	As at 31 Mar 10			
	<12 months	1 – 5 years	>5 years	No specified maturity ⁽¹⁾
	\$m	\$m	\$m	\$m
IRB approach				
Corporate (including SME)	70,072	81,984	22,695	4,831
Sovereign	13,858	5,615	2,564	156
Bank	56,344	5,845	6,658	122
Residential mortgage	46,727	8,084	158,366	458
Qualifying revolving retail	1	-	-	10,119
Retail SME	5,660	6,608	4,101	580
Other retail	221	897	1,460	2,178
Total IRB approach	192,883	109,033	195,844	18,444
Specialised lending (SL)	11,598	19,944	3,594	349
Standardised approach				
Australian and foreign governments	452	2,143	20	150
Bank	8,545	1,102	381	1,171
Residential mortgage	3,611	4,138	30,406	695
Corporate	11,616	9,776	6,430	2,372
Other	442	1,759	4,636	1,078
Total standardised approach	24,666	18,918	41,873	5,466
Total exposure (EaD)	229,147	147,895	241,311	24,259

⁽¹⁾ No specified maturity includes exposure related to credit cards, on demand facilities and guarantees given by the Group with no fixed maturity date.

Exposure type	As at 30 Sep 09			
	<12 months	1 – 5 years	>5 years	No specified maturity
	\$m	\$m	\$m	\$m
IRB approach				
Corporate (including SME)	73,659	91,092	25,103	5,435
Sovereign	7,590	5,161	731	77
Bank	46,192	7,889	7,457	159
Residential mortgage	45,624	8,713	153,494	588
Qualifying revolving retail	1	-	-	9,986
Retail SME	5,581	5,409	4,068	113
Other retail	218	848	1,474	2,266
Total IRB approach	178,865	119,112	192,327	18,624
Specialised lending (SL)	7,437	15,834	3,261	146
Standardised approach				
Australian and foreign governments	2,527	2,553	520	227
Bank	11,830	1,089	470	2
Residential mortgage	3,949	4,268	22,874	542
Corporate	12,942	11,666	7,564	2,626
Other	643	2,101	4,880	1,143
Total standardised approach	31,891	21,677	36,308	4,540
Total exposure (EaD)	218,193	156,623	231,896	23,310

Credit Provisions and Losses

Table 5.1G: Provisions by Asset Class

The following tables set out credit risk provision information by Basel II asset class, excluding non-lending assets, equities and securitisation. Definitions of impairment and past due facilities are based on APRA Prudential Standard APS 220: Credit Quality and related guidance notes. The determination of specific provisions is in accordance with APRA Guidance Note AGN 220.2: Impairment, Provisioning and the General Reserve for Credit Losses. Impaired facilities are disclosed in accordance with APRA's definition of impaired facilities under Guidance Note AGN 220.1: Impaired Asset Definitions paragraph 7.

Exposure type	As at 31 Mar 10			6 months ended 31 Mar 10	
	Impaired facilities ⁽¹⁾	Past due facilities ≥90 days	Specific provisions ⁽²⁾	Charges for specific provisions	Write-offs ⁽³⁾
	\$m	\$m	\$m	\$m	\$m
IRB approach					
Corporate (including SME)	2,719	449	908	345	450
Sovereign	-	1	-	-	-
Bank	39	-	39	-	29
Residential mortgage	692	998	144	48	48
Qualifying revolving retail	-	60	-	99	101
Retail SME	170	124	95	40	38
Other retail	11	51	7	47	57
Total IRB approach	3,631	1,683	1,193	579	723
Specialised lending (SL)	908	54	205	180	-
Standardised approach					
Australian and foreign governments	-	-	-	-	-
Bank	-	-	-	-	-
Residential mortgage	54	190	11	3	6
Corporate	1,128	261	156	200	186
Other	80	58	16	116	105
Total standardised approach	1,262	509	183	319	297
Total	5,801	2,246	1,581	1,078	1,020
Additional regulatory specific provisions ⁽²⁾			572		
General reserve for credit losses ⁽⁴⁾			2,820		

⁽¹⁾ Impaired facilities include \$465 million of restructured loans (September 2009: \$384 million). These loans represent facilities which have been classified as restructured for reasons relating to the financial difficulty of the counterparty but exclude \$281 million of facilities (September 2009: \$312 million) which have been classified as restructured for reasons which do not relate to the financial difficulty of the counterparty.

Impaired facilities also include \$344 million of gross impaired fair value assets (September 2009: \$366 million).

⁽²⁾ Specific provisions for prudential purposes include all provisions for impairment assessed on an individual basis in accordance with AIFRS excluding securitisation. All collective provisions on defaulted or otherwise non-performing assets, regardless of expected loss, such as those for 90+ days past due retail and in default with no loss non-retail exposures, have been reported as additional regulatory specific provisions and shown in this report as a separate item.

Specific provisions include \$111 million (September 2009: \$98 million) of gross impaired fair value assets.

⁽³⁾ Write-offs are net of recoveries.

⁽⁴⁾ The GRCL at 31 March 2010 is calculated as follows:

	\$m
Collective provision for doubtful debts	3,610
Less collective provisions for securitisation and management overlay for conduit assets and derivatives	(190)
Less collective provisions reported as additional regulatory specific provisions	(572)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (pre-tax basis)	2,848
Less tax effect	(766)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (after-tax basis)	2,082
Plus reserve created through a deduction from retained earnings	738
General reserve for credit losses (after-tax basis)	2,820

Exposure type	As at 30 Sep 09			6 months ended 30 Sep 09	
	Impaired facilities \$m	Past due facilities ≥90 days \$m	Specific provisions \$m	Charges for specific provisions \$m	Write-offs \$m
IRB approach					
Corporate (including SME)	2,962	431	1,117	856	714
Sovereign	-	-	-	-	-
Bank	-	-	-	-	-
Residential mortgage	750	918	137	141	118
Qualifying revolving retail	-	73	-	70	63
Retail SME	124	115	66	66	23
Other retail	11	56	6	86	80
Total IRB approach	3,847	1,593	1,326	1,219	998
Specialised lending (SL)	397	10	25	9	32
Standardised approach					
Australian and foreign governments	-	-	-	-	-
Bank	-	-	-	-	-
Residential mortgage	52	185	17	14	7
Corporate	1,091	268	154	344	363
Other	49	78	20	154	149
Total standardised approach	1,192	531	191	512	519
Total	5,436	2,134	1,542	1,740	1,549
Additional regulatory specific provisions			529		
General reserve for credit losses ⁽¹⁾			2,834		

⁽¹⁾ Changes to the calculation of the GRCL were effective 31 December 2009. The GRCL at 30 September 2009 was calculated as follows:

	\$m
Collective provision for doubtful debts	3,553
Less collective provisions for securitisation and management overlay for conduit assets and derivatives	(190)
Less collective provisions reported as additional regulatory specific provisions	(529)
Collective provision for doubtful debts eligible for inclusion in a general reserve for credit losses (pre-tax basis)	2,834

Factors Impacting Loss Experience in the six months ended 31 March 2010

Non-Impaired facilities 90+ Days Past Due

90+ days past due facilities increased during the March 2010 half year.

In Corporate (including SME), the increase in 90+ days past due facilities from September 2009 was primarily due to the business portfolio in Australia. While there has been an increase in Residential Mortgage and Retail SME 90+ days past due facilities from September 2009, there was a small decline in qualifying revolving retail 90+ days past due facilities.

The increase in Specialised Lending 90+ days past due facilities from September 2009 was mainly the result of an increase in Income Producing Real Estate (IPRE) supervisory slotting, which was predominately reallocated from Corporate (including SME).

There has been a marginal decrease for 90+ days past due facilities under the standardised portfolio from September 2009, despite the ongoing challenging economic conditions in the UK. Of particular note, the performance of 90+ days past due mortgages continued to compare favourably against the UK Council of Mortgage Lenders industry average (December 2009).

Impaired facilities

Impaired facilities (inclusive of gross impaired fair value assets) have increased during the March 2010 half year, although the rate of increase has slowed significantly when compared to the increase during the September 2009 half year.

For Corporate (including SME), an increase in impaired facilities during the March 2010 half year was more than offset by the reallocation to Specialised Lending. Retail SME impaired facilities, which are predominately concentrated in Australia and have not been materially impacted by supervisory slotting, increased during the March 2010 half year.

The resilience of the Residential Mortgages portfolio was further demonstrated by the overall decline in the Group's impaired Residential Mortgage facilities during the half year to March 2010. This improvement was driven mainly by the Australian mortgages portfolio.

Impaired facilities measured under the standardised approach have increased during the March 2010 half year, largely reflecting the challenging economic and market conditions in the UK.

Charges for specific provisions

During the March 2010 half year, charges for specific provisions (including specific provisions on impaired assets at fair value) declined when compared to the September 2009 half year. This was primarily due to the lower level of specific provision charges raised on large corporate customers across most business units.

Net Write-Offs

The Group continues to actively manage bad debt write-offs with net write-offs reducing during the March 2010 half year from a recent peak in the September 2009 half year. The gross 12 months rolling write-off rate for the Group's total retail portfolio has remained steady from September 2009 and mortgage write-offs remain low.

Table 5.1H: Loss Experience

This table represents the regulatory expected loss estimates (which are forward-looking loss estimates based on the quality of the current portfolio) compared to the actual losses over the last reporting period. Actual losses (net write-offs) measured over the short-term will differ to regulatory expected loss estimates as actual losses are a lag indicator of the quality of the assets in prior periods. Other differences between these measures are noted below:

- Actual losses do not take into account modelled economic costs such as internal workout costs factored into estimates of loss;
- Regulatory expected loss is based on the quality of exposures at a point-in-time using long run PDs and stressed LGDs as required by APRA. In most years actual losses would be below the regulatory expected loss estimate; and
- Regulatory expected loss includes expected losses on non-defaulted assets which is a function of long-run PD and downturn stressed LGD. For defaulted exposures, regulatory expected loss is based on the best estimates of loss which represents the assessed provisions.

	6 months ended 31 Mar 10	As at 31 Mar 10	6 months ended 31 Mar 09	As at 31 Mar 09
	Actual loss (write-offs) \$m	Regulatory expected loss \$m	Actual loss (write-offs) \$m	Regulatory expected loss \$m
IRB approach				
Corporate	450	2,934	122	2,833
Sovereign	-	2	-	-
Bank	29	83	-	12
Residential mortgage	48	740	26	711
Qualifying revolving retail	101	234	89	244
Retail SME	38	312	-	-
Other retail	57	186	42	166
Total IRB approach	723	4,491	279	3,966

	12 months ended 30 Sep 09	As at 30 Sep 09	12 months ended 30 Sep 08	As at 30 Sep 08
	Actual loss (write-offs) \$m	Regulatory expected loss \$m	Actual loss (write-offs) \$m	Regulatory expected loss \$m
IRB approach				
Corporate	836	2,950	164	2,057
Sovereign	-	3	-	-
Bank	-	83	-	18
Residential mortgage	144	734	44	655
Qualifying revolving retail	152	221	168	226
Retail SME	23	252	-	-
Other retail	122	182	76	149
Total IRB approach	1,277	4,425	452	3,105

Table 5.1I: Provisions by Industry

This table shows provisioning information by industry. Industry classifications follow ANZSIC Level 1 classifications. The calculation of these balances is consistent with the corresponding disclosure requirements in Table 5.1G 'Provisions by Asset Class'. Totals do not include amounts relating to non-lending assets, equities or securitisation.

Industry sector	As at 31 Mar 10			6 months ended 31 Mar 10	
	Impaired facilities	Past due facilities ≥90 days	Specific provisions	Charges for specific provisions	Write-offs
	\$m	\$m	\$m	\$m	\$m
Accommodation, cafes, pubs and restaurants	318	50	145	125	22
Agriculture, forestry, fishing and mining	692	65	199	76	62
Business services and property services	170	58	70	36	30
Commercial property	2,032	437	332	244	130
Construction	163	50	46	13	9
Finance and insurance	494	25	189	-	99
Manufacturing	272	45	117	54	105
Personal	26	174	16	235	265
Residential mortgages	746	1,188	155	51	54
Retail and wholesale trade	305	88	147	111	186
Transport and storage	45	14	25	11	15
Other	538	52	140	122	43
Total	5,801	2,246	1,581	1,078	1,020
Additional regulatory specific provisions			572		

Industry sector	As at 30 Sep 09			6 months ended 30 Sep 09	
	Impaired facilities	Past due facilities ≥90 days	Specific provisions	Charges for specific provisions	Write-offs
	\$m	\$m	\$m	\$m	\$m
Accommodation, cafes, pubs and restaurants	82	33	27	39	29
Agriculture, forestry, fishing and mining	698	66	205	125	4
Business services and property services	128	62	51	51	34
Commercial property	1,629	388	241	297	245
Construction	317	75	48	57	58
Finance and insurance	713	16	303	338	259
Manufacturing	296	34	183	110	89
Personal	32	218	14	268	304
Residential mortgages	802	1,103	154	155	125
Retail and wholesale trade	403	66	213	200	114
Transport and storage	52	24	28	29	45
Other	284	49	75	71	243
Total	5,436	2,134	1,542	1,740	1,549
Additional regulatory specific provisions			529		

Table 5.1J: Provisions by Geography

Geographic region	As at 31 Mar 10			
	Impaired facilities	Past due facilities ≥90 days	Specific provisions	General reserve for credit losses ⁽⁴⁾
	\$m	\$m	\$m	\$m
Australia ⁽¹⁾	3,445	1,544	1,051	2,173
Europe	1,709	481	318	952
New Zealand	570	221	193	208
Other ⁽²⁾	77	-	19	87
Total ⁽³⁾	5,801	2,246	1,581	3,420
Regulatory specific provisions			572	(572)
Less tax effect				(766)
Plus reserve created through retained earnings				738
General reserve for credit losses				2,820

⁽¹⁾ The Australian geography contains a central bad and doubtful debt provision against the current uncertain global environment.

⁽²⁾ 'Other' comprises United States of America and Asia.

⁽³⁾ The GRCL balance allocated across geographic regions of \$3,420 million includes \$2,982 million of provisions on loans at amortised cost and \$438 million of provisions held on assets at fair value.

⁽⁴⁾ Changes to the calculation of the GRCL were effective 31 December 2009. Refer to page 9 – 10 of this report for further information on the calculation of the GRCL at 31 March 2010 and 30 September 2009.

Geographic region	As at 30 Sep 09			
	Impaired facilities	Past due facilities ≥90 days	Specific provisions	General reserve for credit losses
	\$m	\$m	\$m	\$m
Australia	3,132	1,445	1,006	2,145
Europe	1,673	517	310	943
New Zealand	523	172	182	206
Other	108	-	44	69
Total	5,436	2,134	1,542	3,363
Additional regulatory specific provisions			529	(529)
General reserve for credit losses ⁽¹⁾				2,834

⁽¹⁾ The GRCL balance allocated across geographic regions of \$3,363 million includes \$2,918 million of provisions on loans at amortised cost and \$445 million of provisions held on assets at fair value.

Table 5.1K: Movement in Provisions

This table discloses the reconciliation of changes in provisions. It shows movements in the balance of provisions over the reporting period for both specific provisions and the general reserve for credit losses. Totals do not include amounts relating to non-lending assets, equities or securitisation.

	6 months ended 31 Mar 10	6 months ended 30 Sep 09
	\$m	\$m
General reserve for credit losses		
Collective provision balance at start of period	2,918	2,870
Total charge to income statement for impairment loss	1,213	1,922
Net transfer to specific provision	(1,078)	(1,740)
Recoveries	-	-
Balances written off	-	-
Acquisition of controlled entities	9	-
Foreign currency translation and other adjustments	(80)	(134)
Collective provision on loans at amortised cost	2,982	2,918
Plus provisions held on assets at fair value ⁽¹⁾	438	445
Less additional regulatory specific provisions	(572)	(529)
Less tax effect	(766)	-
Plus reserve created through retained earnings	738	-
General reserve for credit losses ⁽²⁾	2,820	2,834
Specific provisions		
Balance at start of period	1,444	1,277
Net transfer from collective provision	1,078	1,740
Bad debts recovered	74	75
Bad debts written off	(1,094)	(1,624)
Acquisition of controlled entities	-	2
Foreign currency translation and other adjustments	(32)	(26)
Specific provisions excluding provisions for assets at fair value	1,470	1,444
Specific provisions held on assets at fair value	111	98
Additional regulatory specific provisions	572	529
Total regulatory specific provisions	2,153	2,071
Total provisions	4,973	4,905

⁽¹⁾ Provisions held on assets at fair value are presented gross of \$11 million regulatory specific provisions for assets held at fair value (September 2009: \$20 million).

⁽²⁾ Changes to the calculation of the GRCL were effective 31 December 2009. Refer to page 9 – 10 of this report for further information on the calculation of the GRCL at 31 March 2010 and 30 September 2009.

5.2 Disclosures of Standardised and Supervisory Slotting Portfolios

Table 5.2A: Standardised Exposures by Risk Weight

The following table shows the credit exposure amount before and after risk mitigation ⁽¹⁾ in each risk category subject to the Standardised approach. For the purposes of this disclosure, an ADI's outstandings represent its exposure (drawn balances plus EaD on undrawn) after risk mitigation.

	As at 31 Mar 10		As at 30 Sep 09	
	Credit exposure before risk mitigation \$m	Credit exposure after risk mitigation \$m	Credit exposure before risk mitigation \$m	Credit exposure after risk mitigation \$m
Standardised approach – risk weights				
0%	7,720	7,717	12,260	12,256
20%	6,572	2,916	7,358	5,030
35%	18,867	18,838	14,001	13,974
50%	6,102	5,768	3,919	3,548
75%	4,317	4,316	3,484	3,482
100%	45,752	43,999	51,728	49,703
150%	1,593	1,589	1,666	1,655
Total standardised approach (EaD) ⁽¹⁾	90,923	85,143	94,416	89,648

⁽¹⁾ The Group recognises the mitigation of credit risk as a result of eligible financial collateral and mitigation providers. Eligible financial collateral, under the Standardised approach, when used to reduce levels of exposure refers to cash and cash equivalents as defined in APRA Prudential Standard APS 112 Capital Adequacy: Standardised Approach to Credit Risk ("APS 112").

Table 5.2B: Standardised Exposures by Risk Grade

Asset class by rating grade	As at 31 Mar 10		As at 30 Sep 09	
	Credit exposure before risk mitigation \$m	Credit exposure after risk mitigation \$m	Credit exposure before risk mitigation \$m	Credit exposure after risk mitigation \$m
Australian and foreign governments				
Credit rating grade 1	2,559	2,609	3,355	5,508
Credit rating grade 2	206	-	2,263	-
Credit rating grade 3	-	-	146	-
Unrated	-	-	63	46
Sub-total	2,765	2,609	5,827	5,554
Bank				
Credit rating grade 1	10,295	6,628	11,431	9,192
Credit rating grade 2	128	128	799	799
Unrated	776	25	1,161	313
Sub-total	11,199	6,781	13,391	10,304
Residential mortgage				
Unrated	38,850	38,770	31,633	31,543
Sub-total	38,850	38,770	31,633	31,543
Corporate				
Credit rating grade 1	-	-	631	631
Unrated	30,194	29,101	34,167	32,877
Sub-total	30,194	29,101	34,798	33,508
Other				
Unrated	7,915	7,882	8,767	8,739
Sub-total	7,915	7,882	8,767	8,739
Total standardised approach (EaD)	90,923	85,143	94,416	89,648

Table 5.2C: Supervisory Slotting by Risk Weight

The following table shows the credit exposure after risk mitigation amount in each risk bucket, subject to the supervisory risk weights in IRB (any Specialised Lending products subject to supervisory slotting), where the aggregate exposure in each risk bucket is disclosed. For the purposes of this disclosure, an ADI's outstandings represent its exposure (drawn balances plus a credit conversion factor on undrawn balances) after risk mitigation.

	As at	
	31 Mar 10	30 Sep 09
	Exposure after risk mitigation	Exposure after risk mitigation
	\$m	\$m
IRB supervisory slotting – unexpected loss risk weights		
0%	1,304	674
70%	15,047	9,846
90%	12,800	8,789
115%	4,354	5,790
250%	1,191	703
Total IRB supervisory slotting (EaD) ⁽¹⁾	34,696	25,802
IRB equity exposure – risk weights		
300% ⁽²⁾	63	35
400% ⁽³⁾	268	231
Total IRB equity exposure (EaD)	331	266

⁽¹⁾ Exposure is reported net of any specific provisions or associated depreciation.

⁽²⁾ Relates to exposures that fall within 'equity' IRB asset class that are not deducted from capital and are listed on a recognised exchange.

⁽³⁾ Relates to exposures that fall within 'equity' IRB asset class that are not deducted from capital and are not listed on a recognised exchange.

5.3 Disclosures for Internal Rating Based Portfolios

Portfolios Subject to IRB Approach

Table 5.3A: Non-Retail Exposures by Risk Grade

This table provides a break down of gross non-retail (business) credit exposure by PD risk grade for on- and off-balance sheet combined, categorised into bands that broadly correspond to externally recognised risk grades. Moody's risk grades have been included as a reference point. Exposure has been categorised into PD grades as assessed by the Group's own internal ratings system and exclude non-lending assets, equities, securitisation and specialised lending.

External credit rating equivalent	As at 31 Mar 10						
	PD risk grade mapping						
	Aa3 and above	A1, A2, A3	Baa1, Baa2, Baa3	Ba1, Ba2, Ba3	B1, B2	B2 and below	Default
IRB approach	0<0.03%	0.03<0.15%	0.15<0.5%	0.5<3.0%	3.0<10.0%	10.0<100%	100%
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Total exposure ⁽¹⁾							
Corporate	2,444	26,300	41,464	75,132	26,545	1,979	5,718
Sovereign	19,084	2,929	138	27	13	-	2
Bank	27,747	36,934	3,967	240	10	-	71
Total exposure (EaD)	49,275	66,163	45,569	75,399	26,568	1,979	5,791
Undrawn commitments							
Corporate	278	9,266	11,795	10,773	3,102	122	493
Sovereign	452	147	114	7	5	-	-
Bank	223	940	44	9	-	-	2
Total undrawn commitments ⁽²⁾	953	10,353	11,953	10,789	3,107	122	495
IRB approach							
Exposure weighted average EaD (\$m) ⁽³⁾							
Corporate	0.81	0.80	0.43	0.27	0.23	0.32	0.57
Sovereign	10.24	1.50	0.67	0.03	0.21	-	0.03
Bank	2.34	1.99	1.81	0.45	0.33	-	11.86
Exposure weighted average LGD (%)							
Corporate	32.1%	46.4%	41.9%	32.8%	35.6%	38.7%	47.0%
Sovereign	5.8%	32.0%	44.9%	44.0%	44.6%	-	39.0%
Bank	30.8%	23.5%	20.2%	52.9%	59.6%	-	59.6%
Exposure weighted average risk weight (%)							
Corporate	12.6%	27.7%	47.1%	66.3%	103.3%	195.4%	281.3%
Sovereign	0.5%	23.9%	76.2%	96.5%	156.1%	-	204.9%
Bank	6.5%	6.9%	23.0%	117.4%	198.2%	-	1.1%

⁽¹⁾ Gross credit exposure is defined in Table 5.1A, 'Credit Risk Exposures Summary', on page 9 of this report.

⁽²⁾ Total undrawn commitments are included in the calculation of Total Exposure (EaD) shown above.

⁽³⁾ Simple average of exposure by number of arrangements.

External credit rating equivalent	As at 30 Sep 09						
	PD risk grade mapping						
	Aa3 and above	A1, A2, A3	Baa1, Baa2, Baa3	Ba1, Ba2, Ba3	B1, B2	B2 and below	Default
0<0.03%	0.03<0.15%	0.15<0.5%	0.5<3.0%	3.0<10.0%	10.0<100%	100%	
IRB approach	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Total exposure							
Corporate	1,061	26,670	43,012	87,667	29,471	2,115	5,293
Sovereign	12,100	303	1,117	36	2	-	1
Bank	25,070	33,359	2,912	249	5	-	102
Total exposure (EaD)	38,231	60,332	47,041	87,952	29,478	2,115	5,396
Undrawn commitments							
Corporate	319	8,358	11,334	12,423	3,279	205	332
Sovereign	388	40	863	21	1	-	-
Bank	348	1,008	11	8	-	-	2
Total undrawn commitments	1,055	9,406	12,208	12,452	3,280	205	334
IRB approach							
Exposure weighted average EaD (\$m)							
Corporate	0.71	0.82	0.41	0.29	0.23	0.36	0.51
Sovereign	8.79	2.09	11.64	0.05	0.05	-	0.08
Bank	2.21	1.77	1.11	0.41	0.14	-	0.85
Exposure weighted average LGD (%)							
Corporate	39.5%	45.6%	41.2%	33.7%	35.3%	44.0%	47.3%
Sovereign	10.9%	15.3%	45.0%	44.6%	45.0%	-	45.0%
Bank	34.4%	29.3%	28.7%	54.3%	60.8%	-	60.9%
Exposure weighted average risk weight (%)							
Corporate	12.2%	27.2%	46.7%	69.1%	104.1%	217.5%	266.9%
Sovereign	1.1%	6.9%	75.7%	92.8%	137.6%	-	334.0%
Bank	8.4%	10.6%	28.8%	131.6%	183.4%	-	110.9%

Table 5.3B: Retail Exposures by Risk Grade

This table provides a break down of gross retail (personal) credit exposure by PD risk grade, categorised into bands that broadly correspond to externally recognised risk grades, ranging from Super Senior Investment Grade to Defaulted exposures. Exposure excludes non-lending assets, equities and securitisation.

IRB approach	As at 31 Mar 10						
	PD risk grade mapping						
	0<0.1%	0.1<0.3%	0.3<0.5%	0.5<3.0%	3.0<10.0%	10.0<100%	100%
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Total exposure ⁽¹⁾							
Residential mortgage	31,234	64,712	33,688	66,325	12,919	2,858	1,899
Qualifying revolving retail	3,004	2,109	1,039	2,161	1,252	494	61
Retail SME	104	2,829	232	8,801	4,135	270	578
Other retail	747	814	274	1,342	1,152	343	84
Total exposure (EaD)	35,089	70,464	35,233	78,629	19,458	3,965	2,622
Undrawn commitments							
Residential mortgage	10,694	12,249	4,035	4,584	172	25	4
Qualifying revolving retail	2,326	1,282	641	534	147	31	1
Retail SME	12	729	40	1,422	466	16	68
Other retail	532	288	79	228	94	40	1
Total undrawn commitments ⁽²⁾	13,564	14,548	4,795	6,768	879	112	74
IRB approach							
Exposure weighted average EaD (\$m)							
Residential mortgage	0.04	0.20	0.20	0.29	0.31	0.25	0.18
Qualifying revolving retail	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Retail SME	0.06	0.03	0.05	0.03	0.04	0.04	0.03
Other retail	small	0.01	small	0.01	0.01	small	0.01
Exposure weighted average LGD (%)							
Residential mortgage	20.0%	20.1%	20.3%	20.2%	20.2%	20.8%	21.2%
Qualifying revolving retail	83.4%	84.0%	84.3%	86.1%	87.0%	87.3%	88.9%
Retail SME	23.8%	30.9%	28.5%	33.7%	34.1%	36.5%	44.4%
Other retail	80.9%	79.1%	79.8%	78.5%	77.1%	70.9%	69.9%
Exposure weighted average risk weight (%)							
Residential mortgage	3.5%	8.1%	15.6%	28.5%	66.6%	109.2%	194.6%
Qualifying revolving retail	4.0%	8.4%	17.4%	41.9%	114.6%	225.9%	294.4%
Retail SME	5.1%	15.6%	20.6%	38.7%	52.5%	83.4%	290.4%
Other retail	12.9%	29.7%	55.6%	92.1%	121.0%	161.8%	243.2%

⁽¹⁾ Gross credit exposure is defined in Table 5.1A, 'Credit Risk Exposures Summary', on page 9 of this report.

⁽²⁾ Total undrawn commitments are included in the calculation of Total Exposure (EaD) shown above.

IRB approach	As at 30 Sep 09						
	PD risk grade mapping						
	0<0.1%	0.1<0.3%	0.3<0.5%	0.5<3.0%	3.0<10.0%	10.0<100%	100%
	\$m	\$m	\$m	\$m	\$m	\$m	\$m
Total exposure							
Residential mortgage	29,927	56,697	25,825	80,921	10,514	2,658	1,877
Qualifying revolving retail	2,995	2,179	920	2,080	1,278	479	56
Retail SME	74	2,697	203	7,796	3,660	257	484
Other retail	792	850	279	1,350	1,109	338	88
Total exposure (EaD)	33,788	62,423	27,227	92,147	16,561	3,732	2,505
Undrawn commitments							
Residential mortgage	10,825	10,122	3,723	7,068	117	23	8
Qualifying revolving retail	2,371	1,359	558	548	162	33	1
Retail SME	22	738	41	1,369	472	18	64
Other retail	571	305	82	227	86	32	1
Total undrawn commitments	13,789	12,524	4,404	9,212	837	106	74
IRB approach							
Exposure weighted average EaD (\$m)							
Residential mortgage	0.04	0.18	0.20	0.28	0.26	0.25	0.18
Qualifying revolving retail	0.01	0.01	0.01	0.01	0.01	0.01	0.01
Retail SME	0.06	0.03	0.05	0.03	0.04	0.04	0.03
Other retail	small	0.01	0.01	0.01	0.01	small	0.01
Exposure weighted average LGD (%)							
Residential mortgage	20.0%	20.0%	20.1%	20.3%	20.4%	21.0%	21.1%
Qualifying revolving retail	83.3%	84.0%	84.4%	86.1%	87.0%	87.4%	89.0%
Retail SME	29.5%	30.3%	31.2%	33.3%	33.0%	35.0%	44.6%
Other retail	80.9%	79.2%	80.1%	78.0%	77.3%	73.0%	70.8%
Exposure weighted average risk weight (%)							
Residential mortgage	3.5%	8.1%	15.2%	30.4%	67.5%	111.5%	196.5%
Qualifying revolving retail	3.9%	8.4%	17.1%	41.6%	112.9%	223.7%	339.0%
Retail SME	6.2%	15.2%	22.2%	37.9%	50.9%	80.6%	311.4%
Other retail	12.9%	29.9%	56.0%	91.7%	121.6%	164.8%	296.6%

5.4 Credit Risk Mitigation

Table 5.4A: Mitigation by Eligible Collateral

This table discloses the total credit exposure, subject to the Standardised and supervisory slotting criteria approaches, covered by eligible financial collateral. Exposure excludes non-lending assets, equities and securitisation.

	As at 31 Mar 10	
	Total of which is exposure covered by eligible financial collateral ⁽¹⁾	
	\$m	\$m
Specialised lending (SL)	35,485	789
Standardised approach		
Australian and foreign governments	2,765	156
Bank	11,199	4,418
Residential mortgage	38,850	80
Corporate	30,194	1,093
Other	7,915	33
Total standardised approach	90,923	5,780

⁽¹⁾ Eligible financial collateral, when used to reduced levels of exposure, refers to cash and cash equivalents as defined in APS 112. Exposure covered by eligible financial collateral is measured after the application of regulatory haircuts.

	As at 30 Sep 09	
	Total of which is exposure covered by eligible financial collateral	
	\$m	\$m
Specialised lending (SL)	26,678	876
Standardised approach		
Australian and foreign governments	5,827	273
Bank	13,391	3,087
Residential mortgage	31,633	90
Corporate	34,798	1,290
Other	8,767	28
Total standardised approach	94,416	4,768

Table 5.4B: Mitigation by Guarantees and Credit Derivatives

This table discloses the total credit exposure covered by the guarantees and credit derivatives relating to each portfolio. Exposure excludes non-lending assets, equities and securitisation.

	As at 31 Mar 10		
	Total exposure	of which is covered by guarantees	of which is covered by credit derivatives
	\$m	\$m	\$m
IRB approach			
Corporate (including SME)	179,582	17,028	-
Sovereign	22,193	2	-
Bank	68,969	599	1,766
Residential mortgage	213,635	-	-
Qualifying revolving retail	10,120	-	-
Retail SME	16,949	-	-
Other retail	4,756	-	-
Total IRB approach	516,204	17,629	1,766
Specialised lending (SL)	35,485	-	-
Standardised approach			
Australian and foreign governments	2,765	-	-
Bank	11,199	421	-
Residential mortgage	38,850	-	-
Corporate	30,194	1	-
Other	7,915	-	-
Total standardised approach	90,923	422	-

	As at 30 Sep 09		
	Total exposure	of which is covered by guarantees	of which is covered by credit derivatives
	\$m	\$m	\$m
IRB approach			
Corporate (including SME)	195,289	18,133	-
Sovereign	13,559	-	-
Bank	61,697	617	2,000
Residential mortgage	208,419	-	-
Qualifying revolving retail	9,987	-	-
Retail SME	15,171	-	-
Other retail	4,806	-	-
Total IRB approach	508,928	18,750	2,000
Specialised lending (SL)	26,678	-	-
Standardised approach			
Australian and foreign governments	5,827	-	-
Bank	13,391	484	-
Residential mortgage	31,633	-	-
Corporate	34,798	-	-
Other	8,767	-	-
Total standardised approach	94,416	484	-

6. Securitisation

6.1 Third Party Securitisation

The tables in this section ('Traditional Originating ADI Securitisation Exposures', 'Synthetic Originating ADI Securitisation Exposures' and 'Total Originating ADI Securitisation Exposures') are broken down by the type of asset within a securitisation special purpose vehicle ("SPV") and provide the Group's exposures to those securitisations. These tables do not provide Group assets that have been sold to securitisations.

Table 6.1A: Total Originating ADI Securitisation Exposures

This table is the sum of tables 'Traditional Originating ADI Securitisation Exposures' (Table 6.1B) and 'Synthetic Originating ADI Securitisation Exposures' (Table 6.1C) on the following pages. It sets out the amounts of facilities and provides an indication of the relative extent to which the Group has exposure.

	As at 31 Mar 10			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	59	-	7,298	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	780	-
CDOs/CLOs	447	-	3,190	-
Commercial loans	70	-	-	-
Commercial mortgages	-	-	776	-
Corporate bonds	-	-	1,139	-
Other	-	-	1,972	-
Total underlying asset	576	-	15,155	-

	As at 30 Sep 09			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	146	-	8,290	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	1,014	-
CDOs/CLOs	466	-	3,469	-
Commercial loans	71	-	-	-
Commercial mortgages	-	-	857	-
Corporate bonds	-	-	1,150	-
Other	-	-	2,167	-
Total underlying asset	683	-	16,947	-

Table 6.1B: Traditional Originating ADI Securitisation Exposures

Traditional securitisations are those in which the pool of assets is assigned to an SPV, usually by a sale. The table below sets out the amounts of facilities and provides an indication of the relative extent to which the Group has exposure.

	As at 31 Mar 10			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	59	-	7,298	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	780	-
CDOs/CLOs	-	-	1,648	-
Commercial loans	70	-	-	-
Commercial mortgages	-	-	776	-
Corporate bonds	-	-	1,139	-
Other	-	-	1,972	-
Total underlying asset	129	-	13,613	-

	As at 30 Sep 09			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	146	-	8,290	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	1,014	-
CDOs/CLOs	-	-	1,884	-
Commercial loans	71	-	-	-
Commercial mortgages	-	-	857	-
Corporate bonds	-	-	1,150	-
Other	-	-	2,167	-
Total underlying asset	217	-	15,362	-

Table 6.1C: Synthetic Originating ADI Securitisation Exposures

Synthetic securitisations are those in which the risk of the pool of assets is transferred to an SPV through a derivative, usually a credit default swap.

	As at 31 Mar 10			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	-	-	-	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	-	-
CDOs/CLOs	447	-	1,542	-
Commercial loans	-	-	-	-
Commercial mortgages	-	-	-	-
Corporate bonds	-	-	-	-
Other	-	-	-	-
Total underlying asset	447	-	1,542	-

	As at 30 Sep 09			
	Total outstanding exposures			
	Directly originated assets	Indirectly originated assets	Facilities provided	Other (manager services)
	\$m	\$m	\$m	\$m
Underlying asset				
Residential mortgage	-	-	-	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	-	-
CDOs/CLOs	466	-	1,585	-
Commercial loans	-	-	-	-
Commercial mortgages	-	-	-	-
Corporate bonds	-	-	-	-
Other	-	-	-	-
Total underlying asset	466	-	1,585	-

Table 6.1D: Securitisation by Type of Exposure

The table below breaks down the securitisation exposures by type of facility. The Group holds securities issued by securitisation SPVs as part of its trading book and banking book.

	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Securitisation exposure type		
Liquidity facilities	2,651	3,586
Warehouse facilities	11,406	12,212
Credit enhancements	123	159
Derivative transactions	167	572
Securities	31	228
Credit derivatives transactions	1,542	1,585
Other	9	88
Total securitisation exposures	15,929	18,430

Table 6.1E: New Facilities Provided

The table below shows new securitisation facilities provided in the 6 months to 31 March 2010.

Securitisation exposure type	6 months ended 31 Mar 10	6 months ended 30 Sep 09
	Notional amount of facilities provided	
	\$m	\$m
Liquidity facilities	13	10
Warehouse facilities	541	2,254
Credit enhancements	-	-
Derivative transactions	-	-
Securities	-	-
Credit derivatives transactions	-	-
Other	-	-
Total new facilities provided	554	2,264

Table 6.1F: Exposures by Risk Weight

This table shows the risk weights for securitisation exposures as calculated under APS 120, predominately using the Internal Assessment Approach.

Risk weight bands	As at 31 Mar 10		As at 30 Sep 09	
	Exposure \$m	RWA \$m	Exposure \$m	RWA \$m
≤10%	3,938	280	3,742	270
> 10% ≤ 25%	4,923	814	6,754	1,076
> 25% ≤ 35%	209	72	183	64
> 35% ≤ 50%	989	494	621	309
> 50% ≤ 75%	319	229	536	370
> 75% ≤ 100%	2,804	2,804	2,935	2,935
> 100% ≤ 650%	2,259	7,355	2,375	5,944
Deductions	290	-	484	-
Total securitisation exposures	15,731	12,048	17,630	10,968

Table 6.1G: Exposures Deducted from Capital

The table below shows securitisation exposures which have been deducted from capital, divided into those that relate to securitisations of Group assets and other securitisations.

	As at 31 Mar 10						Total
	Deductions relating to ADI-originated assets securitised					Deductions relating to other securitisation exposures	
	Residential mortgage ⁽²⁾	Credit cards and other personal loans	Auto and equipment finance	Commercial loans	Other		
	\$m	\$m	\$m	\$m	\$m	\$m	
Securitisation exposures deducted from capital ⁽¹⁾							
Deductions from Tier 1 capital	1	-	-	34	-	110	145
Deductions from Tier 2 capital	1	-	-	34	-	110	145
Total securitisation exposures deducted from capital	2	-	-	68	-	220	290

⁽¹⁾ These exposures fall into three categories:

Exposures which have an internal rating below an equivalent Standard & Poor's rating of BB- or are unrated (deducted 50/50 from Tier 1 and Tier 2 capital).

First loss facilities (deducted 50/50 from Tier 1 and Tier 2 capital).

Capitalised securitisation start up costs (deducted from Tier 1 capital).

All exposures are net of specific provisions that have been made.

⁽²⁾ The decrease in deductions from Tier 1 and Tier 2 capital relating to Residential Mortgages since 30 September 2009 is due to a change in status for UK owned securitised assets for capital adequacy purposes.

	As at 30 Sep 09						Total
	Deductions relating to ADI-originated assets securitised					Deductions relating to other securitisation exposures	
	Residential mortgage	Credit cards and other personal loans	Auto and equipment finance	Commercial loans	Other		
	\$m	\$m	\$m	\$m	\$m	\$m	
Securitisation exposures deducted from capital							
Deductions from Tier 1 capital	47	-	-	36	-	162	245
Deductions from Tier 2 capital	41	-	-	36	-	162	239
Total securitisation exposures deducted from capital	88	-	-	72	-	324	484

6.2 Group Owned Securitised Assets

This section provides information about assets that the Group has securitised. The Group may or may not retain an exposure to securitisation SPVs to which the Group has sold assets. As such, the information in this section is not related to the information in the previous section 'Securitisation Exposures'.

This section does not include information about the Group's internal securitisation pools of residential mortgage backed securities. These securities have been developed as a source of contingent liquidity to further support the Group's liquid asset holdings.

Table 6.2A: Assets Securitised by the Group

This table shows the classes of assets that have been securitised by the Group.

	As at 31 Mar 10				
	Total outstanding exposures securitised assets originated by ADI		Impaired assets relating to exposures securitised	Total past due assets from exposures securitised	ADI recognised loss from exposures securitised
	Traditional	Synthetic			
	\$m	\$m	\$m	\$m	\$m
Underlying asset ⁽¹⁾					
Residential mortgage	5,314	-	22	58	-
Credit cards	-	-	-	-	-
Auto and equipment finance	4	-	-	-	-
Commercial loans	-	1,758	-	-	-
Other	-	-	-	-	-
Total underlying asset	5,318	1,758	22	58	-

⁽¹⁾ The definition of impaired and past due assets are consistent with the definition provided within the Glossary of this report.

	As at 30 Sep 09				
	Total outstanding exposures securitised assets originated by ADI		Impaired assets relating to exposures securitised	Total past due assets from exposures securitised	ADI recognised loss from exposures securitised
	Traditional	Synthetic			
	\$m	\$m	\$m	\$m	\$m
Underlying asset					
Residential mortgage	6,330	-	23	59	-
Credit cards	-	-	-	-	-
Auto and equipment finance	15	-	-	-	-
Commercial loans	-	1,758	-	-	-
Other	-	-	-	-	-
Total underlying asset	6,345	1,758	23	59	-

Table 6.2B: Recent Securitisation Activity

This table shows the amount of assets sold by the Group to securitisation SPVs in the six months to 31 March 2010 and any gain or loss on sale.

	6 months ended 31 Mar 10			6 months ended 30 Sep 09		
	Amount securitised during period directly originated	Amount securitised during period indirectly originated	Recognised gain or loss on sale	Amount securitised during period directly originated	Amount securitised during period indirectly originated	Recognised gain or loss on sale
Underlying asset						
Residential mortgage	-	-	-	-	-	-
Credit cards	-	-	-	-	-	-
Auto and equipment finance	-	-	-	-	-	-
Commercial loans	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total underlying asset	-	-	-	-	-	-

Table 6.2C: Securitisation Subject to Early Amortisation

Attachment G of APS 120 provides for specific regulatory treatment for securitisations of certain types of assets. None of these securitisations has been undertaken by the Group.

	As at 31 Mar 10					
	Aggregate drawn exposure attributed to:		Aggregate IRB capital charge against ADI's retained shares from:		Aggregate IRB capital charge against the ADI from investors' shares of:	
	Seller interest \$m	Investor interest \$m	Drawn balances \$m	Undrawn lines \$m	Drawn balances \$m	Undrawn lines \$m
Recent securitisation activity						
Residential mortgage	-	-	-	-	-	-
Commercial mortgage	-	-	-	-	-	-
Auto and equipment finance	-	-	-	-	-	-
Commercial loans	-	-	-	-	-	-
Corporate bonds	-	-	-	-	-	-
CDOs	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total recent securitisation activity	-	-	-	-	-	-

	As at 30 Sep 09					
	Aggregate drawn exposure attributed to:		Aggregate IRB capital charge against ADI's retained shares from:		Aggregate IRB capital charge against the ADI from investors' shares of:	
	Seller interest \$m	Investor interest \$m	Drawn balances \$m	Undrawn lines \$m	Drawn balances \$m	Undrawn lines \$m
Recent securitisation activity						
Residential mortgage	-	-	-	-	-	-
Commercial mortgage	-	-	-	-	-	-
Auto and equipment finance	-	-	-	-	-	-
Commercial loans	-	-	-	-	-	-
Corporate bonds	-	-	-	-	-	-
CDOs	-	-	-	-	-	-
Other	-	-	-	-	-	-
Total recent securitisation activity	-	-	-	-	-	-

7. Market Risk

Table 7.1A: Standard Method Risk Weighted Assets

	As at	
	31 Mar 10 \$m	30 Sep 09 \$m
Risk weighted assets		
Interest rate risk	1,494	1,798
Equity position risk	3	1
Foreign exchange risk	205	134
Commodity risk ⁽¹⁾	4	370
Total risk weighted assets - standard method ⁽²⁾	1,706	2,303

⁽¹⁾ APRA approved the Group's use of the Internal Model Approach to calculate regulatory capital relating to commodities trading (this was previously calculated under the Standard Method). This approval became effective from January 2010. The remaining \$4m commodity Standard Method RWA comprises Commodity Inventory Finance & Carbon Trading activities which remain under the Standard Method approach for the calculation of regulatory capital/ RWA.

⁽²⁾ The following products are currently covered by the standard method: equities, CPI products, carbon trading, and specific market risk capital for all applicable products.

Table 7.1B: Total Risk Weighted Assets

	As at	
	31 Mar 10 \$m	30 Sep 09 \$m
Market risk		
Standard method	1,706	2,303
Internal model approach	1,599	1,112
Total market risk RWA ⁽¹⁾	3,305	3,415
% of total Group (level 2) RWA	1.0%	1.0%

⁽¹⁾ APRA approved the Group's use of the Internal Model Approach to calculate regulatory capital relating to commodities trading (this was previously calculated under the Standard Method). The change in methodology has contributed to the decrease in Standard Method RWA and the increase of the Internal Model Approach RWA between September 2009 and March 2010.

Table 7.1C: Internal Model Approach Value at Risk

The following table provides information on the high, medium and low value at risk (“VaR”) over the reporting period and at period end.

	6 months ended 31 Mar 10			As at
	Mean value	Minimum value	Maximum value	31 Mar 10
	\$m	\$m	\$m	\$m
Value at risk at a 99% confidence level ⁽¹⁾				
Foreign exchange risk	4	1	10	6
Interest rate risk	8	6	12	7
Volatility risk	1	1	2	1
Commodities risk	-	-	1	-
Credit risk	8	7	9	7
Inflation risk	-	-	-	-
Diversification benefit ⁽²⁾	(8)	n/a	n/a	(6)
Total value at risk for physical and derivative positions	13	8	17	15

⁽¹⁾ VaR is measured individually for foreign exchange risk, interest rate risk, volatility risk, commodities risk, credit risk and inflation risk. The individual risk categories do not sum up to the total risk number due to diversification benefits. Risk limits are applied in these categories separately and against the total risk position.

⁽²⁾ The maximums/ minimums by risk types will likely occur during different days in the period. As such, the sum of these figures will not equal the total maximum/ minimum VaR, which is the maximum/ minimum aggregate VaR position during the period.

	6 months ended 30 Sep 09			As at
	Mean value	Minimum value	Maximum value	30 Sep 09
	\$m	\$m	\$m	\$m
Value at risk at a 99% confidence level				
Foreign exchange risk	4	1	9	1
Interest rate risk	8	5	12	6
Volatility risk	2	1	3	1
Commodities risk	-	-	-	-
Credit risk	6	4	8	6
Inflation risk	-	-	-	-
Diversification benefit	(9)	n/a	n/a	(6)
Total value at risk for physical and derivative positions	11	7	16	8

Table 7.1D: Back-testing Results

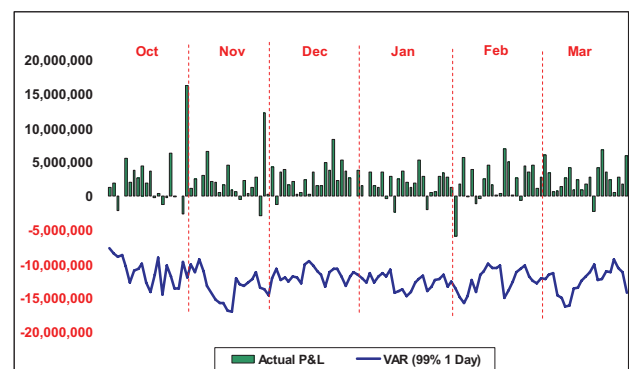
Comparison of value at risk estimates to actual gains/losses	6 months ended 31 Mar 10	6 months ended 30 Sep 09
Number of “outliers” incurred for the trading portfolio	-	-

VaR estimates are backtested for reasonableness on a daily basis. The following graph compares the Group’s daily VaR estimates against actual profit and loss.

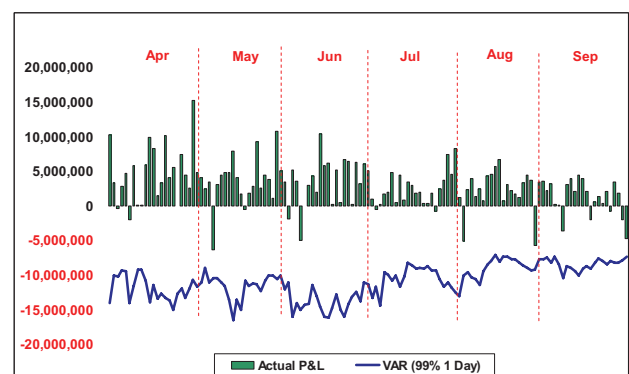
Backtesting Outlier Commentary

Backtesting, carried out by comparing the Group’s daily VaR estimate against actual P&L numbers, showed no exceptions during the six month period to 31 March 2010, or during the previous six month period to 30 September 2009. This is well within the acceptable model parameters and indicates acceptable operation of the VaR model within APRA Guidelines.

6 months ended 31 Mar 10



6 months ended 30 Sep 09



8. Operational Risk

Table 8A: Total Risk Weighted Assets

	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Operational risk		
Standardised approach	4,452	4,575
Advanced measurement approach	17,950	18,397
Total operational risk RWA	22,402	22,972
% of total Group (level 2) RWA	6.7%	6.7%

9. Non-Traded Market Risk

9.1 Equities Banking Book Position

Table 9.1A: Equities Banking Book Position

This table provides the value of investments disclosed in the balance sheet, as well as the fair value of those investments.

	As at 31 Mar 10		As at 30 Sep 09	
	Carrying value ⁽¹⁾	Fair value ⁽²⁾	Carrying value	Fair value
	\$m	\$m	\$m	\$m
Total listed equities (publicly traded)	63	63	35	35
Total unlisted equities	268	268	231	231

⁽¹⁾ Carrying value as recorded in the Statement of Financial Position, in accordance with accounting standards.

⁽²⁾ The best evidence of fair value is quoted prices in an active market. If the market for a financial instrument is not active, fair value is established by using a valuation technique.

Table 9.1B: Gains and Losses on Equity Investments

This table provides the realised (actual) gains/losses arising from sales and liquidations in the reporting period recognised through the profit and loss account. Unrealised (expected) gains/losses included in Tier 1 and Tier 2 capital are gains/losses recognised in the balance sheet but not through the profit and loss account.

	6 months ended	
	31 Mar 10	30 Sep 09
	\$m	\$m
Gains (losses) on equity investments		
Cumulative realised gains (losses) in reporting period	7	12
Total unrealised gains (losses)	(63)	(39)
Total unrealised gains (losses) included in Tier 1/ Tier 2 capital	(28)	6

Table 9.1C: Risk Weighted Assets by Equity Asset Class

This table shows RWAs by equity asset class. Equity investments subject to a 300% risk-weight are those exposures that fall within the equity IRB asset class that are not deducted from capital and that are listed on a recognised exchange. Equity investments subject to a 400% risk-weight are those exposures that fall within the equity IRB asset class that are not deducted from capital and that are not listed on a recognised exchange.

	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Risk weighted assets		
Equities subject to 300% RW	190	105
Equities subject to 400% RW	1,071	925
Total risk weighted assets	1,261	1,030

Table 9.1D: Equity Investments Subject to Grandfathering Provision

The Group does not have any equity investments that are subject to grandfathering provisions.

	As at	
	31 Mar 10	30 Sep 09
	\$m	\$m
Total equity investments	-	-

9.2 Interest Rate Risk in the Banking Book

Table 9.2A: Interest Rate Risk in the Banking Book

This table provides the increase or decrease in earnings or economic value for upward and downward rate shocks broken down by currency.

	As at 31 Mar 10		As at 30 Sep 09	
	200 bp parallel increase \$m	200 bp parallel decrease \$m	200 bp parallel increase \$m	200 bp parallel decrease \$m
Change in economic value ⁽¹⁾				
AUD	(98)	111	(80)	90
CAD	-	-	-	-
CHF	-	-	-	-
EUR	(8)	8	-	-
GBP	(24)	25	(5)	6
HKD	5	(5)	-	-
JPY	(1)	1	-	-
NZD	11	(12)	6	(5)
SGD	-	-	-	-
USD	(13)	13	(1)	1
Other	-	-	-	-
Total change in economic value	(128)	141	(80)	92

⁽¹⁾ The Group's ten major currencies are modelled on an individual basis. The remaining immaterial currencies are aggregated and modelled using a single yield curve.

Table 9.2B: Total Risk Weighted Assets

	As at	
	31 Mar 10 \$m	30 Sep 09 \$m
IRRBB risk weighted assets	5,653	4,160
% of total Group (level 2) RWA	1.7%	1.2%

All components of IRRBB regulatory capital are calculated using a historical VaR simulation using at least 8 years of historical data at a 99% confidence level, one year investment term of capital, and a 12-month holding period.

10. Glossary

Term	Description
ADI	Authorised Deposit-taking Institution ("ADI") as defined by APRA, and authorised by APRA to take deposits from customers.
Advanced IRB approach	The Advanced Internal Ratings Based ("IRB") approach refers to the processes employed by the Group to estimate credit risk. This is achieved through the use of internally developed models to assess potential credit losses using the outputs from the PD, LGD and E&D models.
AMA	Advanced Measurement Approach ("AMA") is the risk estimation process used for the Group's operational risk. It combines internally developed risk estimation processes with an integrated risk management process, embedded within the business with loss event management.
APRA	The Australian Prudential Regulation Authority ("APRA") is the prudential regulator of the Australian financial services industry. APRA has defined its Basel II requirements in a series of Australian Prudential Standards ("APS").
Back testing	Back-testing refers to the process undertaken to monitor performance of the Group's risk models. Historical data is used to compare the actual outcomes to the expected outcomes.
BIPRU	BIPRU refers to the UK Financial Services Authority's requirements and guidance for accreditation under Basel II. It refers to the Prudential Sourcebook for Banks, Building Societies and Investment Firms.
Capital adequacy	Capital adequacy is the outcome of identifying and quantifying the major risks the Group is exposed to, and the capital that the Group determines as an appropriate level to hold for these risks, as well as its strategic and operational objectives, including its target credit rating.
Credit derivatives	Credit derivatives include single-name credit defaults and certain total rate of return swaps, cash funded credit linked notes and first and second to default credit derivative basket products. ADIs may also recognise any more complex credit derivatives that do not fall into the list above, that have been approved by APRA.
CDO	Collateralised Debt Obligation.
CLO	Collateralised Loan Obligation.
Company	National Australia Bank Limited ABN 12 004 044 937
E&D	Exposure at Default ("E&D") is an estimate of the total committed credit exposure expected to be drawn at the time of default for a customer or facility that the Group would incur in the event of a default within the next 12 months. It is used in the calculation of RWA.
ELE	The Extended License Entity ("ELE") comprises the ADI itself and any APRA approved subsidiary entities assessed as effectively part of a single 'stand-alone' entity, as defined in APS 110.
Eligible financial collateral	Eligible financial collateral, under the standardised approach, will be the amount of cash collateral, netting and eligible bonds and equities. Eligible financial collateral, under the IRB approach, for corporate, sovereign and bank portfolios, is limited to the collateral items detailed in paragraphs 4 and 23 of Attachment G of APS 112. Recognition of eligible financial collateral is subject to the minimum conditions detailed in that same Attachment, paragraph 6.
Foundation IRB	Foundation Internal Ratings Based ("FIRB") approach refers to an alternative approach to Advanced IRB for non-retail credit risk defined under Basel II where a Group develops its own PD models and seeks approval from its regulator to use these in the calculation of regulatory capital, and the regulator provides a supervisory estimate for LGD and E&D.
Group	The Level 2 Group, being the Company and the entities it controls subject to certain exceptions set out in section 2 'Scope of Application'.
Guarantees	Guarantors under the standardised approach are recognised according to APS 112 Attachment F paragraph 3. The secured portion of an exposure is weighted according to the risk weight appropriate to the guarantor and the unsecured portion is weighted according to the risk weight applicable to the original counterparty (Refer to Attachment A for the appropriate risk weights). Under the IRB approach, for corporate, sovereign and bank portfolios, the ADI may recognise credit risk mitigation in the form of guarantees and credit derivatives according to the FIRB substitution approach where an ADI uses supervisory estimates of LGD (refer to APS 113 Attachment B paragraph 49), an AIRB substitution approach where the ADI has approval from APRA to use its own estimates of LGD (refer to APS 113 Attachment B paragraph 60) and, for certain exposures, a double default approach (refer to APS 113 Attachment B paragraph 67). An ADI may decide, separately for each eligible exposure, to apply either the relevant substitution approach or the double default approach. For retail portfolios there are two approaches for the recognition of credit risk mitigation in the form of guarantees and credit derivatives under the retail IRB approach, a substitution approach (refer to APS 113 Attachment C paragraph 19) and, for certain exposures, a double default approach (refer to APS 113 Attachment C paragraph 28). An ADI may decide separately for each eligible exposure to apply either the substitution approach or the double default approach.
IMA	Internal Model Approach ("IMA") describes the approach used in the assessment of traded market risk. The Group uses, under approval from APRA, the IMA to calculate general market risk for all transactions in the trading book other than those covered by the Standard Method.
Impaired facilities	Impaired facilities consist of retail loans (excluding credit card loans and portfolio managed facilities) which are contractually past due 90 days with security insufficient to cover principal and arrears of interest revenue; non-retail loans which are contractually past due and there is sufficient doubt about the ultimate collectability of principal and interest; and impaired off-balance sheet credit exposures where current circumstances indicate that losses may be incurred. Unsecured portfolio managed facilities when they become 180 days past due, and loans where some concerns exist as to the ongoing ability of the borrowers to comply with the present loan repayment terms, are classified as impaired assets.
IRB	Internal Ratings Based ("IRB") describes the approach used in the assessment of credit risk. Within this document it is used interchangeably with the term advanced Internal Ratings Based approach. This reflects the Group's development of internal credit risk estimation models covering both retail and non-retail credit.
IRRBB	Interest Rate Risk in the Banking Book ("IRRBB") quantifies the inherent risk arising from the Group's banking operations as a result of movements in interest rates. This also includes the impact of differing maturities between assets and liabilities. Quantification of the resulting risk is used in determining capital adequacy.
LGD	Loss Given Default ("LGD") is an estimate of the expected severity of loss for a credit exposure following a default event. Regulatory LGDs reflect a stressed economic condition at the time of default. It is used in the calculation of regulatory capital.
NAB	National Australia Bank Limited ABN 12 004 044 937
Non-retail credit	Non-retail credit broadly refers to credit exposure to business customers. It excludes retail credit defined below.
Non-traded book	Non-traded book refers to the investment in securities held by the Group through to maturity.

Past due facilities ≥ 90 days	Past due facilities ≥ 90 days consist of well-secured assets that are more than 90 days past due and portfolio-managed facilities that are not well secured and between 90 and 180 days past due.
PD	Probability of Default ("PD") is an estimate of the likelihood of a customer defaulting or not repaying their borrowings and other obligations to the Group in the next 12 months.
Qualifying revolving retail exposures	For the purposes of regulatory reporting, credit cards are referred to as qualifying revolving retail.
Regulatory capital	Regulatory capital is the total capital held by the Group as a buffer against potential losses arising from the business the Group operates in. Unlike economic capital, it is calculated based on guidance and standards provided by the Group's regulators, including APRA. It is designed to support stability in the banking system and protect depositors.
Regulatory expected loss	Regulatory Expected Loss ("EL") is a calculation of the estimated loss that may be experienced by the Group over the next 12 months. Regulatory EL calculations are based on the PD, LGD and EAD values of the portfolio at the time of the estimate, which include stressed LGDs for economic conditions. As such, regulatory EL is not an estimate of long-run average expected loss (as was the case previously under dynamic provisioning).
Retail credit	For the purposes of managing credit, two broad categories are used: retail credit and non-retail credit. This reflects the different approaches to the sales and ongoing management of credit and is consistent with the approach taken by Basel II. Retail credit refers to the credit provided to retail or personal customers. For the purposes of regulatory capital, retail credit is categorised into four groups: residential mortgages, credit cards (or qualifying revolving credit) and retail SME and other.
RWA	Risk Weighted Assets
Specific provisions	Specific provisions for prudential purposes include all provisions for impairment assessed on an individual basis in accordance with AIFRS excluding securitisation; and effective 30 September 2009 include all collective provisions on defaulted or otherwise non-performing assets, regardless of expected loss are reported as additional regulatory specific provisions.
Standardised approach	Standardised refers to an alternative approach to the assessment of risk (notably credit and operational) whereby the institution uses external rating agencies to assist in assessing credit risk and/or the application of specific values provided by regulators to determine Risk Weighted Assets.
Tier 1 capital	Tier 1 capital comprises the highest quality components of capital that fully satisfy all of the following essential characteristics: provide a permanent and unrestricted commitment of funds; are freely available to absorb losses; do not impose any unavoidable servicing charge against earnings; and rank behind the claims of depositors and other creditors in the event of winding-up.
Tier 2 capital	Tier 2 capital includes other components of capital that, to varying degrees, fall short of the quality of Tier 1 capital but nonetheless contribute to the overall strength of an entity as a going concern. It is divided into: Upper Tier 2 capital comprising components of capital that are essentially permanent in nature, including some forms of hybrid capital instrument; and Lower Tier 2 capital comprising components of capital that are not permanent.
Traded book	Traded book refers to the Group's investment portfolio that is traded or exchanged in the market from time to time that reflects market opportunities.
Value at Risk	Value at Risk ("VaR") is a mathematical technique that uses statistical analysis of historical data to estimate the likelihood that a given portfolio's losses will exceed a certain amount. Using a minimum of one year's historical data, VaR calculates the potential loss in earnings from adverse market movements, over a one-day time horizon, using a 99% confidence level.
Write-offs	Write-offs represent credit losses in accordance with accounting rules.

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