Risk management

BASIC PRINCIPLES

As described in further detail in the annual financial statements, Intesa Sanpaolo Group policies relating to risk acceptance are defined by the Parent Company's Supervisory Board and Management Board. The Supervisory Board performs its activities through specific committees set up from among its members, including the Control Committee. The Management Board draws on the activities conducted by managerial committees, particularly the Group Risk Governance Committee. Both corporate bodies receive support from the Chief Risk Officer who reports directly to the Chief Executive Officer. The Chief Risk Officer is responsible for proposing the Risk Appetite Framework, setting the Group's risk management and compliance guidelines and policies in accordance with company strategies and objectives and coordinating and verifying the implementation of those guidelines and policies by the responsible units of the Group, including within the various corporate departments. The Chief Risk Officer ensures oversight of the Group's overall risk profile by establishing methods and monitoring exposure to the various types of risk.
The Parent Company is in charge of overall direction, management and control of risks. Group companies that generate credit and/or financial risks are assigned autonomy limits and each has its own control structure. A service agreement governs the risk control activities performed by the Parent Company's functions on behalf of the main subsidiaries. These functions report directly to the subsidiaries' Management Bodies.
The risk measurement and management tools contribute to define a risk-monitoring framework at Group level, capable of assessing the risks assumed by the Group from a regulatory and economic point of view. The level of absorption of economic capital, defined as the maximum "unexpected" loss that could be borne by the Group over a period of one year, is a key measure for determining the Group's financial structure, risk appetite and for guiding operations, ensuring a balance between risks assumed and shareholder returns. It is estimated on the basis of the current situation and also as a forecast, based on the Budget assumptions and projected economic scenario under ordinary and stress conditions. The assessment of capital is included in business reporting and is submitted quarterly to the Group Risk Governance Committee, the Management Board and the Control Committee, as part of the Group's Risks Tableau de Bord. Risk hedging, given the nature, frequency and potential impact of the risk, is based on a constant balance between mitigation/hedging action, control procedures/processes and capital protection measures.

BASEL 2 AND BASEL 3 REGULATIONS AND THE INTERNAL PROJECT

The goal of the Basel 2 Project is the adoption of advanced approaches for credit and operational risks by the main Group companies.
The credit risk situation differs by portfolio:

- for the Corporate segment, authorisation has been obtained from the Supervisory Authority for the use of the AIRB approach on a scope that extends to the Parent Company, the network banks and Mediocredito Italiano (effective 31 December 2010; the FIRB approach had been in use since December 2008) and the foreign company Intesa Sanpaolo Bank Ireland Plc. (effective from reporting as at 31 December 2011). The foreign bank VUB Banka obtained permission to use the FIRB approach effective from the report as at 31 December 2010. With effect from June 2012 permission was obtained to extend the AIRB approach to the subsidiary Banca IMI and for the adoption of rating models for the hedging of Specialised Lending exposures at Group Level, together with the use of internal LGD estimates for the Corporate segment in relation to the product companies Leasing and Mediofactoring (the FIRB approach had been in use since December 2008);
- for the Retail Mortgage segment, permission was granted for the use of the IRB approach effective from June 2010, extended to the former Casse del Centro network banks effective from the report as at 31 December 2011 and to VUB Banka with effect from the report as at 30 June 2012;
- authorisation for transition to the IRB approach was granted for the SME Retail segment effective from the December 2012 report, extending to a scope that includes the Parent Company, network banks and Mediocredito Italiano.

The Group is also proceeding with development of the IRB systems for the other segments and the extension of the scope of companies for their application in accordance with a plan presented to the Supervisory Authority.
With regard to Operational Risk, the Group obtained authorisation to use the Advanced Measurement Approaches (AMA – internal model) to determine the associated capital requirement for regulatory purposes, with effect from the report as at 31 December 2009. The scope of application of the advanced approaches is being progressively expanded in accordance with the roll out plan presented to the Management and to the Supervisory Authorities. For additional details see the section on operational risk.
In April 2013 the Group presented its Annual Internal Capital Adequacy Assessment Process Report as a "class 1" banking group, according to Bank of Italy classification, based on the extensive use of internal approaches for the measurement of risk, internal capital and total capital available.
As part of its adoption of Basel 2, the Group publishes information concerning capital adequacy, exposure to risks and the general characteristics of the systems aimed at identifying, monitoring and managing them in a document entitled "Basel 2 - Pillar 3" or simply "Pillar 3".
The document is published on the website (group.intesasanpaolo.com) each quarter, inasmuch as Intesa Sanpaolo is among the groups that have adopted validated internal approaches for credit, market and operational risk.

As regards developments in the set of regulations known as "Basel 3", the main changes regard the level and quality of capital of the Banks, introduction of the leverage ratio (ratio of Core Tier I and Total Assets, including off balance sheet adjusted for the

actual derivatives exposure), changes in the valuation of counterparty risk and the introduction of two new regulatory liquidity indicators (Liquidity Coverage Ratio and Net Stable Funding Ratio).
In preparing to adopt the new rules envisaged by Basel 3, the Group has undertaken adequate project initiatives, expanding the objectives of the Basel 2 Project in order to improve the measurement systems and the related risk management systems.

CREDIT RISK

The Group's strategies, powers and rules for the granting and managing of loans are aimed at:
- achieving the goal of sustainable growth consistent with the Group's risk appetite and value creation objectives, whilst guaranteeing and improving the quality of its lending operations;
- diversifying the portfolio, limiting the concentration of exposures to counterparties/groups, economic sectors or geographical areas;
- efficiently selecting economic groups and individual borrowers through a thorough analysis of their creditworthiness aimed at limiting the risk of insolvency;
- given the current economic climate, favouring lending business aimed at supporting the real economy and production system and at developing relationships with customers;
- constantly monitoring relationships and the related exposures, through the use of both IT procedures and systematic surveillance of positions that show irregularities with the aim of detecting any symptoms of deterioration in a timely manner.

The Intesa Sanpaolo Group has developed a set of techniques and tools for credit risk measurement and management which ensures analytical control over the quality of loans to customers and financial institutions, and loans subject to country risk.
In particular, with respect to loans to customers, risk is measured using internal rating models which change according to the counterparty's operating segment.

Credit quality

Constant monitoring of the quality of the loan portfolio is also pursued through specific operating checks for all the phases of loan management.
The overall non-performing loan portfolio is subject to a specific management process which, inter alia, entails accurate monitoring through a predetermined control system and periodic managerial reporting. In particular, this activity is performed using measurement methods and performance controls that allow the production of synthetic risk indicators. They allow timely assessments when any anomalies arise or persist and interact with processes and procedures for loan management and for credit risk control.
Within the Group, in accordance with present rules, positions which are attributed a persistent high-risk rating are intercepted (manually or automatically) and included in a unique operational category based on their risk profile. In accordance with the Supervisory Authority instructions, they are classified in the following categories: doubtful loans, exposures to borrowers in default or in similar situations; substandard loans, exposures to borrowers in temporary difficulty, deemed likely to be settled in a reasonable period of time and exposures which satisfy the conditions objectively set by the Supervisory Authority ("objective substandard loans"), although they do not meet the requirements to be classified under doubtful loans; restructured loans, positions for which, due to the deterioration of the economic and financial position of the borrower, the bank (or pool of banks) agrees to modify the original contractual terms giving rise to a loss. Lastly, non-performing loans also include past due positions that cannot be considered mere delays in reimbursements, as established by the Bank of Italy.
With specific reference to "non-performing" past due positions, from 2012 for identification of these positions the Group applies the 90-day limit to all regulatory portfolios, regardless of the respective exposure classes and related credit risk measurement approaches.

(millions of euro)

	30.06.2013			31.12.2012			Changes
	Gross exposure	Total adjustments	Net exposure	Gross exposure	Total adjustments	Net exposure	Net exposure
Doubtful loans	30,969	-18,914	12,055	28,362	-17,160	11,202	853
Substandard loans	17,100	-3,986	13,114	14,480	-2,985	11,495	1,619
Restructured loans	2,272	-273	1,999	3,587	-724	2,863	-864
Past due loans	2,791	-302	2,489	3,244	-332	2,912	-423
Non-performing loans	**53,132**	**-23,475**	**29,657**	**49,673**	**-21,201**	**28,472**	**1,185**
Performing loans	315,309	-2,388	312,921	333,989	-2,550	331,439	-18,518
Performing loans represented by securities	16,173	-347	15,826	17,108	-394	16,714	-888
Loans to customers	**384,614**	**-26,210**	**358,404**	**400,770**	**-24,145**	**376,625**	**-18,221**

Figures restated, where necessary, considering the changes in the scope of consolidation and discontinued operations.

The table above shows an increase for the first half of 2013 of non-performing loans, net of adjustments, by 1.2 billion euro (+4.2%), compared to the end of the previous year. This trend led to a higher incidence of non-performing loans on total loans to customers, increasing from 7.6% to 8.3%. Coverage of non-performing loans came to approximately 44.2%, higher than the level at the end of 2012 (42.7%) and adequate to account for expected losses, also considering the guarantees securing the positions.
In particular, as at 30 June 2013, doubtful loans net of adjustments, reached 12.1 billion euro, up 7.6% since the start of the year. The impact on total loans was 3.4%, with a coverage ratio of 61.1%.
Compared to 31 December 2012, substandard loans increased 14.1% to 13,114 million euro. The growth is largely attributable to a position previously classified among restructured loans. Substandard loans as a proportion of total loans to customers therefore increased from 3% to 3.6%, and the coverage ratio, adequate for the risk intrinsic to this portfolio, was 23.3%, higher than the figure recorded at the end of the previous year.
Restructured loans stood at 1,999 million euro, down compared to the beginning of the year (30.2%), with a coverage ratio of 12.0% lower than the 20.2% of the previous year. In this case, too, the changes in absolute values and coverage ratios were attributable to the same position transferred to substandard loans.
Past due loans recorded a decrease of 423 million euro (-14.5%) to 2,489 million euro from 2,912 million euro for the previous year. As a consequence, the percentage of this type of non-performing loans fell to 0.7% from 0.8% at the end of December. The coverage ratio rose to 10.8% from the previous figure of 10.2%.
Performing exposures decreased, from 331.4 billion euro in the previous year to 312.9 billion euro. In this context, the cumulated collective adjustments on these loans totalled 0.8% of the gross exposure to customers, a value that is unchanged compared to the figure recorded at the end of 2012.

MARKET RISKS

TRADING BOOK

The quantification of trading risks is based on daily and periodic VaR of the trading portfolios of Intesa Sanpaolo and Banca IMI, which represent the main portion of the Group's market risks, to adverse market movements of the following risk factors:

- interest rates;
- equities and market indexes;
- investment funds;
- foreign exchange rates;
- implied volatilities;
- spreads in credit default swaps (CDSs);
- spreads in bond issues;
- correlation instruments;
- dividend derivatives;
- asset-backed securities (ABSs);
- commodities.

A number of the other Group subsidiaries hold smaller trading portfolios with a marginal risk (around 3% of the Group's overall risk). In particular, the risk factors of the international subsidiaries' trading books were local government bonds and positions in interest rates and foreign exchange rates, both relating to linear pay-offs.
For some of the risk factors indicated above, the Supervisory Authority has validated the internal models for the reporting of the capital absorptions of both Intesa Sanpaolo and Banca IMI.
Effective the report as at 30 September 2012, both banks have received authorisation from the Supervisory Authority to extend the scope of the model to specific risk on debt securities. The model was extended on the basis of the current methodological framework (a historical simulation in full evaluation), and required the integration of the Incremental Risk Charge into the calculation of the capital requirement for market risks.
The risk profiles validated are: (i) generic/specific on debt securities and on equities for Intesa Sanpaolo and Banca IMI, (ii) position risk on quotas of UCI underlying CPPI (Constant Proportion Portfolio Insurance) products for Banca IMI, (iii) position risk on dividend derivatives and (iv) position risk on commodities for Banca IMI, the only legal entity in the Group authorised to hold open positions in commodities.

The requirement for stressed VaR is included when determining capital absorption effective from 31 December 2011. The requirement derives from the determination of the VaR associated with a market stress period. This period was identified considering the following guidelines, on the basis of the indications presented in the Basel document "Revision to the Basel 2 market risk framework":

- the period must represent a stress scenario for the portfolio;
- the period must have a significant impact on the main risk factors for the portfolios of Intesa Sanpaolo and Banca IMI;
- the period must allow real historical series to be used for all portfolio risk factors.

In keeping with the historical simulation approach employed to calculate VaR, the latter point is a discriminating condition in the selection of the holding period. In fact, in order to ensure that the scenario adopted is effectively consistent and to avoid the use of driver or comparable factors, the historical period must ensure the effective availability of market data.
As at the date of preparation of this document, the period relevant to the measurement of stressed VaR had been set as 1 January to 31 December 2011 for both Banca IMI and Intesa Sanpaolo.

The analysis of market risk profiles relative to the trading book uses various quantitative indicators and VaR is the most important. Since VaR is a synthetic indicator which does not fully identify all types of potential loss, risk management has been enriched with other measures, in particular simulation measures for the quantification of risks from illiquid parameters (dividends, correlation, ABS, hedge funds).
VaR estimates are calculated daily based on simulations of historical time-series, a 99% confidence level and 1-day holding period.
The following paragraphs provide the estimates and evolution of VaR, defined as the sum of VaR and of the simulation on illiquid parameters, for the trading book of Intesa Sanpaolo and Banca IMI.

In the second quarter of 2013, market risks generated by Intesa Sanpaolo and Banca IMI decreased with respect to the averages for the first quarter of 2013. The average VaR for the period totalled 62.5 million euro.

Daily VaR of the trading book for Intesa Sanpaolo and Banca IMI [(a)]

(millions of euro)

	2013				2012			
	average 2nd quarter	minimum 2nd quarter	maximum 2nd quarter	average 1st quarter	average 4th quarter	average 3rd quarter	average 2nd quarter	average 1st quarter
Intesa Sanpaolo	11.7	8.9	15.0	14.1	16.8	19.6	24.6	24.1
Banca IMI	50.8	41.0	58.8	59.0	65.7	49.5	55.3	72.9
Total	**62.5**	**52.3**	**71.1**	**73.2**	**82.5**	**69.1**	**79.9**	**97.0**

[(a)] Each line in the table sets out past estimates of daily VaR calculated on the quartely historical time-series respectively of Intesa Sanpaolo and Banca IMI; minimum and maximum values for the two companies are estimated using aggregate historical time-series and therefore do not correspond to the sum of the individual values in the column.

During the first six months of 2013, market risks generated by Intesa Sanpaolo and Banca IMI decreased with respect to the values for 2012.

(millions of euro)

	2013			2012		
	average 1st half	minimum 1st half	maximum 1st half	average 1st half	minimum 1st half	maximum 1st half
Intesa Sanpaolo	13.0	8.8	18.1	24.4	23.1	27.5
Banca IMI	54.9	40.9	74.2	64.1	47.2	92.1
Total	**67.9**	**52.3**	**88.5**	**88.5**	**71.0**	**115.4**

[(a)] Each line in the table sets out past estimates of daily VaR calculated on the historical time-series of the first six months of the year respectively of Intesa Sanpaolo and Banca IMI; minimum and maximum values for the two companies are estimated using aggregate historical time-series and therefore do not correspond to the sum of the individual values in the column.

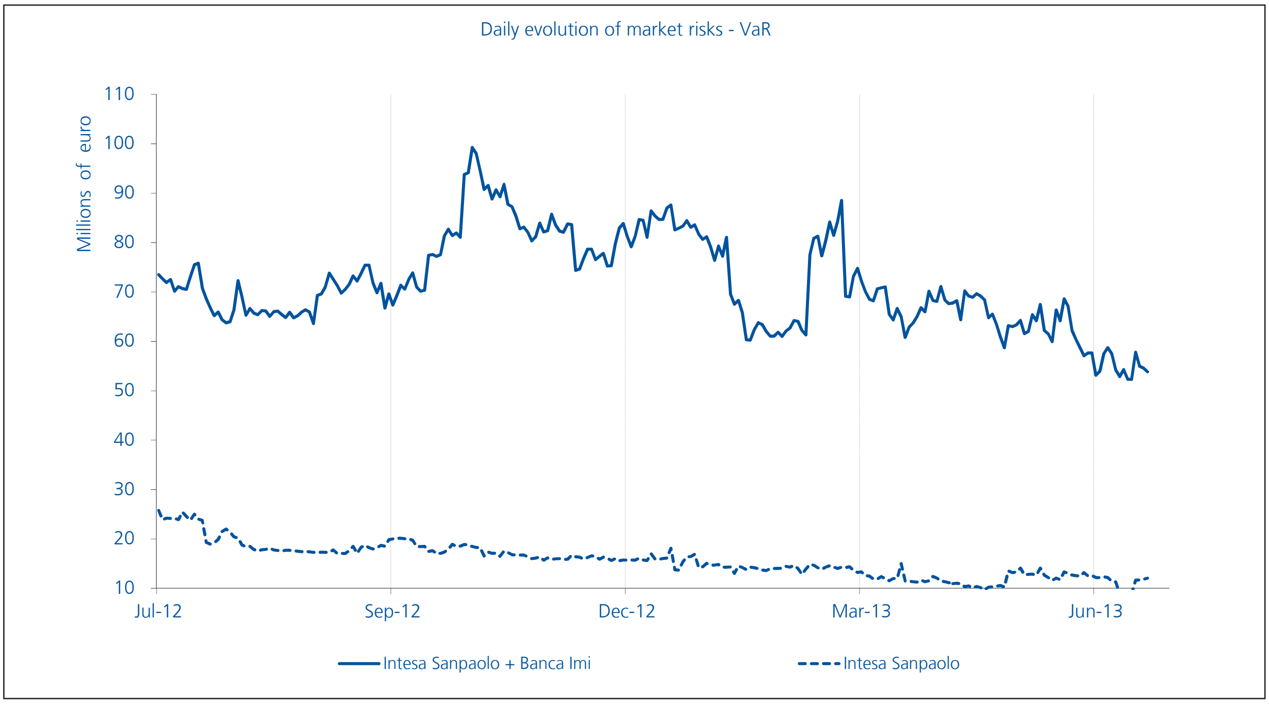
For Intesa Sanpaolo, the breakdown of risk profile in the second quarter of 2013 with regard to the various factors shows the prevalence of the hedge fund risk, which accounted for 35% of total VaR; for Banca IMI, credit spread risk was the most significant, representing 72% of total VaR.

Contribution of risk factors to total VaR[(a)]

2nd quarter 2013	Shares	Hedge funds	Rates	Credit spreads	Foreign exchange rates	Other parameters	Comodities
Intesa Sanpaolo	11%	35%	12%	35%	6%	1%	0%
Banca IMI	6%	0%	10%	72%	1%	7%	4%
Total	**8%**	**8%**	**10%**	**64%**	**2%**	**5%**	**3%**

[(a)] Each line in the table sets out the contribution of risk factors considering 100% the overall capital at risk, calculated as the average of daily estimates in the second quarter of 2013, broken down between Intesa Sanpaolo and Banca IMI and indicating the distribution of overall capital at risk.

VaR in the last twelve months is set out below. In the first half of 2013 the trend was due to two events concerning the Italian government spread scenarios. In particular, at the end of February the VaR peaked as a result of the volatility recorded in the post-elections scenario, whilst from March to the end of June the scenarios for the period April-June 2012 exited from the spread causing the VaR to drop.



Risk control with regard to the trading activity of Intesa Sanpaolo and Banca IMI also uses scenario analyses and stress tests. The impact on the income statement of selected scenarios relating to the evolution of stock prices, interest rates, credit spreads, foreign exchange rates and commodity prices at the end of June is summarised as follows:
- on stock market positions, a bullish scenario, that is a 5% increase in stock prices with a simultaneous 10% decrease in volatility would have led to a 9 million euro gain; the opposite scenario would have led to a 9 million euro loss;
- on interest rate exposures, a parallel +70 basis point shift (average) would have led to a 65 million euro loss, whereas a parallel shift in the euro curve with near zero rates would have led to potential gains of 116 million euro (the interest rate scenarios were reviewed in the light of the Risk Appetite Framework 2013);
- on exposures sensitive to credit spread fluctuations, a 25 basis point widening in spreads would have led to an 88 million euro loss, approximately 3 million euro of which due to structured credit products (SCPs), whereas a 25 basis point tightening of the spreads would have led to an 87 million euro gain;
- on foreign exchange exposures, the portfolio would have recorded a 2 million euro loss if the Euro were to appreciate against the US dollar;
- lastly, on commodity exposures a 9 million euro loss would have been recorded in the event of a 50% increase in prices.

(millions of euro)

	EQUITY		INTEREST RATES		CREDIT SPREADS		FOREIGN EXCHANGE RATES		COMMODITY	
	volatility +10% and prices -5%	volatility -10% and prices +5%	+70bp	lower rate	-25bp	+25bp	-10%	+10%	-50%	+50%
Total	-9	9	-65	116	87	-88	10	-2	26	-9
of which SCP					*4*	*-3*				

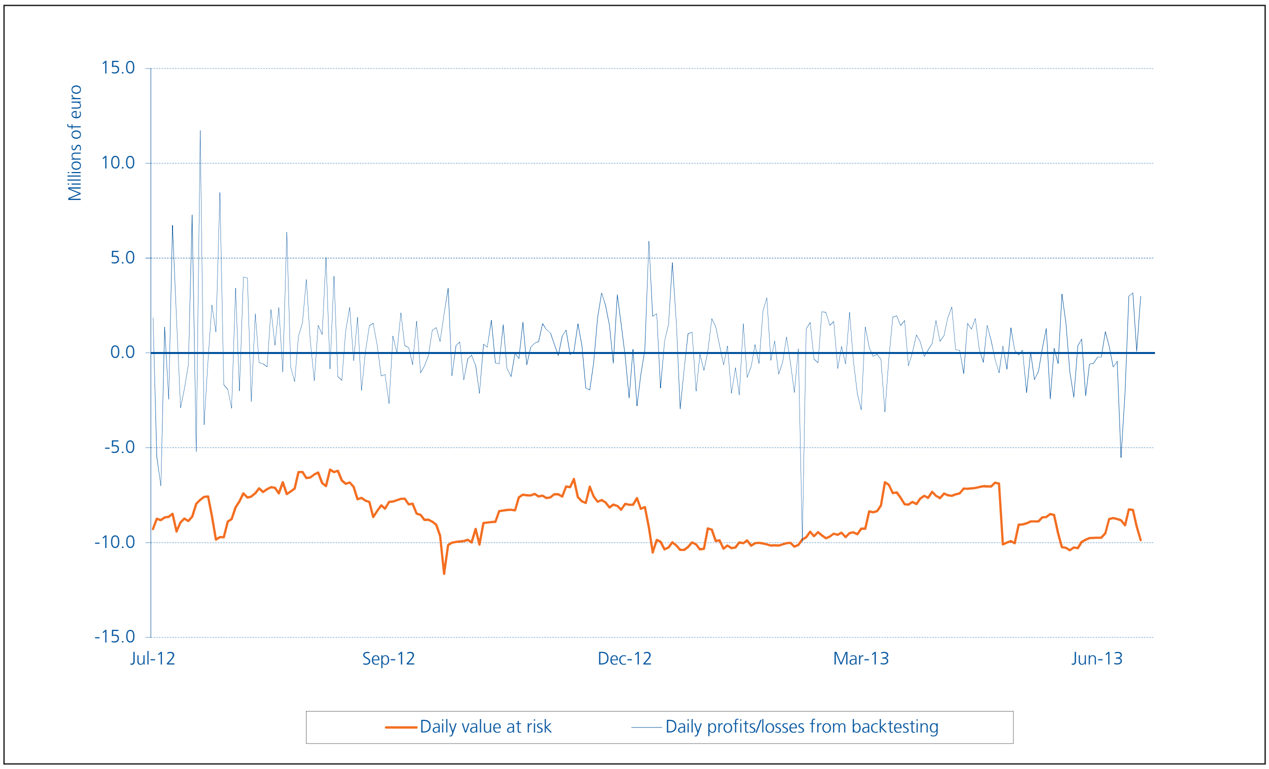
Backtesting

The effectiveness of the VaR calculation methods must be monitored daily via backtesting which, as concerns regulatory backtesting, compares:
- the daily estimates of value at risk;
- the daily profits/losses based on backtesting which are determined using actual daily profits and losses achieved by individual desks, net of components which are not considered in backtesting such as commissions and intraday activities.

Backtesting allows verification of the model's capability of correctly seizing, from a statistical viewpoint, the variability in the daily valuation of trading positions, covering an observation period of one year (approximately 250 estimates). Any critical situations relative to the adequacy of the Internal Model are represented by situations in which daily profits/losses based on backtesting highlight more than three occasions, in the year of observation, in which the daily loss is higher than the value at risk estimate. Current regulations require that backtesting is performed by taking into consideration both the actual P&L series recorded and the theoretical series. The latter is based on valuation of the portfolio value through the use of pricing models adopted for the VaR measurement calculation. The number of significant backtesting exceptions is determined as the maximum between those for actual P&L and theoretical P&L.

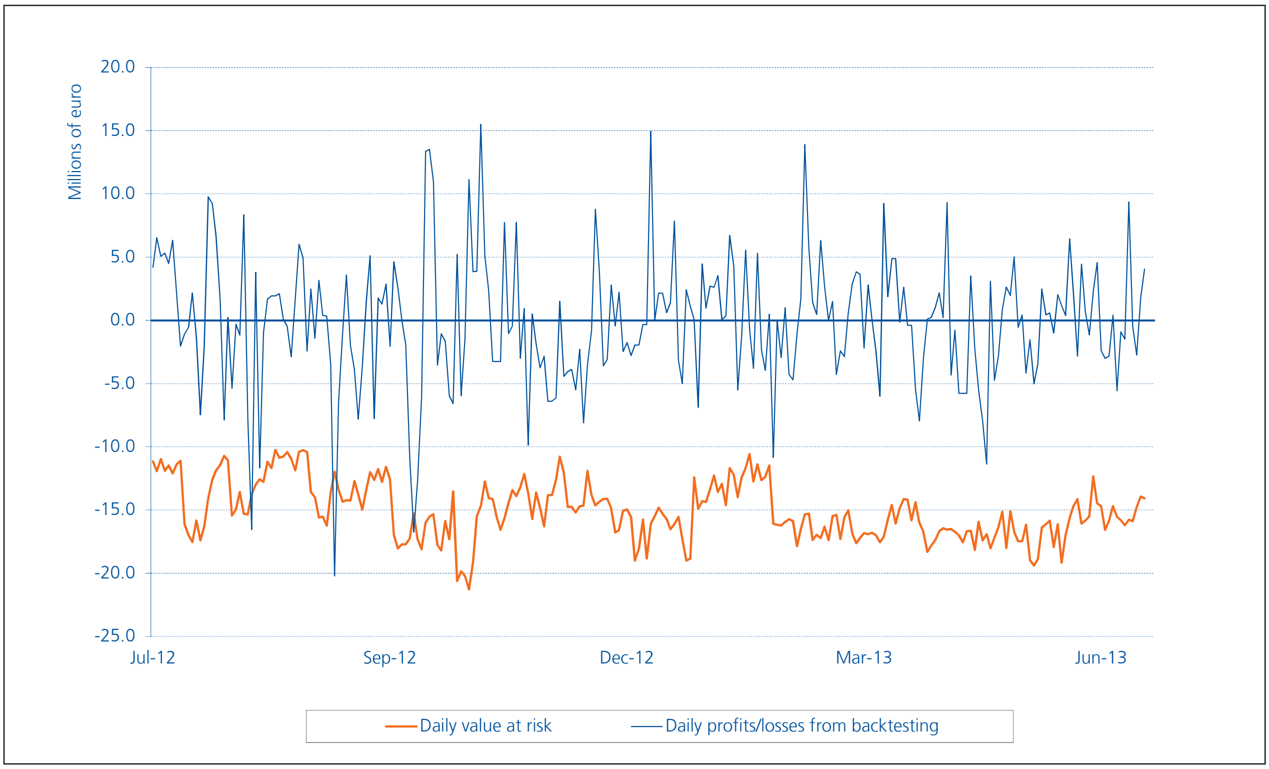
Backtesting in Intesa Sanpaolo

Over the last year, the sole backtesting exception for Intesa Sanpaolo related to the more recent events in the Italian sovereign debt crisis.



Backtesting in Banca IMI

Banca IMI three backtesting exceptions refer to the actual P&L data and are related to the period of high volatility that characterised markets during the summer of 2012.



BANKING BOOK

Market risk originated by the banking book arises primarily in the Parent Company and in the other main Group companies involved in retail and corporate banking. The banking book also includes exposure to market risks deriving from the equity investments in quoted companies not fully consolidated, mostly held by the Parent Company and by Equiter, IMI Investimenti and Private Equity International.

The following methods are used to measure financial risks of the Group's banking book:

– Value at Risk (VaR);
– Sensitivity Analysis.

Value at Risk is calculated as the maximum potential loss in the portfolio's market value that could be recorded over a 10-day holding period with a 99% confidence level (parametric VaR).

Shift sensitivity analysis quantifies the change in value of a financial portfolio resulting from adverse movements in the main risk factors (interest rate, foreign exchange, equity). For interest rate risk, an adverse movement is defined as a parallel and uniform shift of ±100 basis points of the interest rate curve. The measurements include an estimate of the prepayment effect and of the risk originated by customer demand loans and deposits. An update to the methodology aimed at sterilizing the credit spread impact, significantly increased during the recent financial crisis, was introduced from January 2013.

Furthermore, interest margin sensitivity is measured by quantifying the impact on net interest income of a parallel and instantaneous shock in the interest rate curve of ±100 basis points, over a period of 12 months. This measure highlights the effect of variations in interest rates on the portfolio being measured, excluding assumptions on future changes in the mix of assets and liabilities and, therefore, it cannot be considered a predictor of the future levels of the interest margin.

Hedging of interest rate risk is aimed at (i) protecting the banking book from variations in the fair value of loans and deposits due to movements in the interest rate curve or (ii) reducing the volatility of future cash flows related to a particular asset/liability. The main types of derivative contracts used are interest rate swaps (IRS), overnight index swaps (OIS), cross-currency swaps (CCS) and options on interest rates stipulated with third parties or with other Group companies. The latter, in turn, cover risk in the market so that the hedging transactions meet the criteria to qualify as IAS-compliant for consolidated financial statements.

Hedging activities performed by the Intesa Sanpaolo Group are recorded using various hedge accounting methods. A first method refers to the fair value hedge of specifically identified assets or liabilities (micro-hedging), mainly consisting of bonds issued or acquired by Group companies and loans to customers. In addition, macro-hedging is carried out on the stable portion of on demand deposits and in order to hedge against fair value changes intrinsic to the instalments under accrual generated by floating rate operations. The Group is exposed to this risk in the period from the date on which the rate is set and the interest payment date.

Another hedging method used is the cash flow hedge, which has the purpose of stabilising interest flow on both variable rate funding, to the extent that the latter finances fixed-rate investments, and on variable rate investments to cover fixed-rate funding (macro cash flow hedges).

The Risk Management Department is in charge of measuring the effectiveness of interest rate risk hedges for the purpose of hedge accounting.

In the first six months of 2013, interest rate risk generated by the Intesa Sanpaolo Group's banking book, measured through shift sensitivity analysis, registered an average value of 50 million euro settling at 161 million euro at the end of June, almost entirely concentrated on the euro currency; this figure compares with 386 million euro (17 million euro net of the aforementioned methodology updates) at the end of 2012.

Interest margin sensitivity – assuming a 100 basis point change in interest rates – amounted to 324 million euro at the end of June 2013 (270 million euro at the end of 2012).

Interest rate risk, measured in terms of VaR, averaged 34 million euro during the first six months of 2013 (17 million euro at the end of 2012, net of the aforementioned methodology updates), with a minimum value of 27 million euro and a maximum value of 50 million euro, confirmed in the final figures at the end of June. Price risk generated by minority stakes in listed companies, mostly held in the AFS (Available for Sale) category and measured in terms of VaR, recorded an average level of 77 million euro in the first six months of 2013 (81 million euro at the end of 2012), with a maximum value of 80 million euro and a minimum value of 70 million euro, confirmed in the final figures at the end of June.

Lastly, an analysis of banking book sensitivity to price risk, measuring the impact on Shareholders' Equity of a price shock on the above quoted assets recorded in the AFS category shows a sensitivity to a 10% negative shock equal to 44 million euro at the end of June 2013.

LIQUIDITY RISK

Liquidity risk is defined as the risk that the Bank may not be able to meet its payment obligations due to the inability to obtain funds on the market (funding liquidity risk) or liquidate its assets (market liquidity risk).
The arrangement of a suitable control and management system for that specific risk has a fundamental role in maintaining stability, not only at the level of each individual bank, but also of the market as a whole, given that imbalances within a single financial institution may have systemic repercussions. Such a system must be integrated into the overall risk management system and provide for incisive controls consistent with developments in the context of reference.
The "Guidelines for Group Liquidity Risk Management" approved by Intesa Sanpaolo's corporate bodies illustrate the tasks of the various corporate functions, the rules and the set of control and management processes aimed at ensuring prudent monitoring of liquidity risk, thereby preventing the emergence of crisis situations. The key principles underpinning the Liquidity Policy of the Intesa Sanpaolo Group are:

- the existence of liquidity management guidelines approved by senior management and clearly disseminated throughout the bank;
- the existence of an operating structure that works within set limits and of a control structure that is independent from the operating structure;
- the constant availability of an adequate amount of liquidity reserves in relation to the pre-determined liquidity risk tolerance threshold;
- the assessment of the impact of various scenarios, including stress testing scenarios, on the cash inflows and outflows over time and the quantitative and qualitative adequacy of liquidity reserves;
- the adoption of an internal fund transfer pricing system that accurately incorporates the cost/benefit of liquidity, on the basis of the Intesa Sanpaolo Group's funding conditions.

From an organisational standpoint, a detailed definition is prepared of the tasks assigned to the strategic and management supervision bodies and reports are presented to the senior management concerning certain important formalities such as the approval of measurement methods, the definition of the main assumptions underlying stress scenarios and the composition of warning indicators used to activate emergency plans.
The departments of the Parent Company that are in charge of ensuring the correct application of the Guidelines are, in particular, the Treasury Department, responsible for liquidity management, and the Risk Management Department, directly responsible for measuring liquidity risk on a consolidated basis.

With regard to liquidity risk measurement metrics and mitigation tools, in addition to defining the methodological system for measuring short-term and structural liquidity indicators, the Group also formalises the maximum tolerance threshold (risk appetite) for liquidity risk, the criteria for defining liquidity reserves and the rules and parameters for conducting stress tests.
The short-term Liquidity Policy is aimed at ensuring an adequate, balanced level of cash inflows and outflows with certain or estimated maturities included in 12 months' time horizon, in order to respond to periods of tension, including extended periods of tension, on different funding markets, also by establishing adequate liquidity reserves in the form of assets eligible for refinancing with Central Banks or liquid securities on private markets. To that end, and in keeping with the liquidity risk appetite, the system of limits consists of two short-term indicators for holding periods of one week (cumulative projected imbalance in wholesale operations) and of one month (Short Term Gap).
The cumulative projected wholesale imbalances indicator measures the Bank's independence from unsecured wholesale funding in the event of a freeze of the money market and aims to ensure financial autonomy, assuming the use on the market of only the highest quality liquidity reserves. The short-term gap indicator measures, for the various short-term time brackets, the ratio between availability of liquidity reserves and expected positive cash flows to expected and potential cash outflows, with reference to both on- and off-balance sheet captions. This indicator aims to ensure that the Bank maintains an adequate level of unencumbered liquidity reserves that may be converted into cash to meet expected and potential liquidity requirements. To that end, the behavioural coefficients and assumptions underlying the valuation of expected and potential cash flows incorporate cautionary and extremely prudential assumptions (such as: (i) the loss of a portion of customer demand deposits, (ii) unforeseen uses of undrawn committed credit and liquidity lines and (iii) an increase in market volatility for determining haircuts on liquidity reserves and estimating the potential future exposure associated with derivatives positions) effectively constituting an especially severe "base prudential scenario," with the adoption of run-off percentages for demand deposits more conservative than those identified by Basel 3 (LCR).

The aim of Intesa Sanpaolo Group's structural Liquidity Policy is to control and manage the risks deriving from the mismatch of the medium to long-term maturities of the assets and liabilities and involves the adoption of internal limits on maturities' transformations aimed at preventing the medium to long-term operations from giving rise to excessive imbalances to be financed in the short term.
The Guidelines also call for the periodic estimate of the liquidity position in an acute combined stress scenario (both firm specific and market related), with the definition of a target threshold for the 3-month stressed short-term gap, aiming at establishing an overall level of reserves suitable to face greater cash outflows during a period of time (3 months) adequate to take the required operating measures to restore the Group to balanced conditions. The acute stress scenario is determined by combining:

- a "firm-specific" stress scenario, relating to a liquidity crisis specific to the Bank, reflected in an accelerated withdrawal of funds by deposit-holders, a significant reduction in the realised value of assets due to the need for immediate liquidation of assets not eligible for refinancing through repurchase agreements, the activation of downgrade triggers and the need to repurchase own debt securities or honour extra-contractual obligations in order to attenuate reputational risk;
- a "market-related" stress scenario, representing a general market crisis extending to both the financial and industrial sectors, characterised by, for example: (i) failure to repay granted facilities to corporate customers; (ii) a sudden increase in uses of lines of credit and guarantees; and (iii) a significant increase in market volatility, with negative effects on the value of reserves or potential future exposure associated with positions in derivatives, resulting in larger haircuts and the need for additional guarantees.

The Guidelines also establish methods for management of a potential liquidity crisis, defined as a situation of difficulty or inability of the Bank to meet its cash obligations falling due, without implementing procedures and/or employing instruments that, due to their intensity or manner of use, do not qualify as ordinary administration. By setting itself the objectives of safeguarding the

Group's asset value and also guaranteeing the continuity of operations under conditions of extreme liquidity emergency, the Contingency Liquidity Plan ensures the identification of the early warning signals and their ongoing monitoring, the definition of procedures to be implemented in situations of liquidity stress, the immediate lines of action, and the intervention measures for the resolution of emergencies. The pre-warning indexes, aimed at spotting the signs of a potential liquidity strain, both systemic and specific, are monitored with daily frequency by the Risk Management Department.

In the first six months of 2013, the Group's liquidity position remained within the risk limits provided for in the Group's Liquidity Policy both in terms of short-term and structural liquidity indicators.
The regulatory indicators envisaged by Basel 3 have also already been satisfied (LCR and NSFR > 100%), and have further improved following the regulatory revision of early January 2013. Adequate, timely information regarding the development of market conditions and the position of the Bank and/or Group was provided to company bodies and internal committees in order to ensure full awareness and manageability of the prevalent risk factors.

As at 30 June 2013, the Central Banks eligible liquidity reserves came to 127 billion euro (115 billion euro at the end of December 2012), of which 85 billion euro, net of haircut, was unencumbered (67 billion euro at the end of December 2012).

INFORMATION ON FINANCIAL PRODUCTS

In line with the requests for utmost transparency made by supranational and national Supervisory Authorities, the following information is provided on the fair value measurement methods adopted, structured credit products, activities performed through Special Purpose Entities (SPE), leveraged finance transactions, hedge fund investments and transactions in derivatives with customers.

FAIR VALUE MEASUREMENT OF FINANCIAL ASSETS AND LIABILITIES

General principles

This chapter summarises the criteria used by the Group to measure the fair value of financial instruments. As already illustrated in the criteria for the preparation of this Report, the application of IFRS 13 governing fair value measurement and related disclosure became mandatory from 1 January 2013.
The new standard does not extend the scope of application of fair value measurement. The aim, in fact, was to "concentrate" into a single standard the rules for measurement at fair value previously contained in various standards, in some cases with prescriptions in conflict with one another.
The fair value is the price receivable for the sale of an asset or which would be paid to transfer a liability in a normal transaction between market operators (i.e. not as part of the compulsory liquidation or a below-cost sale) as at the measurement date. Fair value is a market measurement criterion that is not entity-specific.
An entity has to measure the fair value of an asset or liability by adopting the assumptions that would be used by market operators to determine the price of an asset or liability, presuming that the market operators act with a view to satisfying their own economic interest in the best way possible.

In determining the fair value of a financial instrument, IFRS 13 establishes a hierarchy of criteria based on the origin, type and quality of the information used in the calculation. The aim of this classification is to establish a hierarchy in terms of reliability of the fair value based on the level of discretion applied by companies, giving precedence to the use of market-observable parameters that reflect the assumptions that market operators would make in pricing the asset or liability. The hierarchy also aims to increase coherence and comparability in fair value measurements.
Three different levels of input are identified:

– Level 1: input represented by quoted prices (unadjusted) in active markets for identical assets or liabilities accessible by the entity as at the measurement date;
– Level 2: input other than quoted prices included in Level 1 that are directly or indirectly observable for the assets or liabilities to be measured;
– Level 3: input unobservable for the asset or liability.

The choice between the aforesaid methodologies is not optional, since they must be applied according to a hierarchy: absolute priority is attributed to effective market quotes (level 1) for the valuation of assets and liabilities or for similar assets and liabilities measured using valuation techniques based on market-observable parameters other than financial instruments quotes (level 2) and a lower priority to assets and liabilities whose fair value is determined using valuation techniques based on non-observable and, therefore, more discretional inputs (level 3).
The valuation technique defined for a financial instrument is adopted over time and is modified only following significant changes in market conditions or the subjective conditions related to the issuer of the financial instrument.

The valuation process of financial instruments ("Fair Value Policy") entails the following phases:

– identification of the sources for measurements: for each asset class, the Market Data Reference Guide establishes the processes necessary to identify market parameters and the means according to which such data must be extracted and used;
– certification and treatment of market data for measurements: this stage consists of the accurate verification of the market parameters used (verifying the integrity of data contained on the proprietary platform with respect to the source of contribution), reliability tests (consistency of each single figure with similar or comparable figures) and verification of concrete application means;
– certification of pricing models and Model Risk Assessment: this phase is aimed at verifying the consistency and the adherence of the various measurement techniques used with current market practice, at highlighting any critical aspects in the pricing models used and at determining any adjustments necessary for measurement;
– monitoring consistency of pricing models over time: periodical monitoring of the adherence to the market of the pricing model in order to discover any gaps promptly and start the necessary verifications and interventions.

The Fair Value Policy also provides for adjustments to reflect the model risk and other uncertainties relating to valuation. In particular, model risk is represented by the possibility that the valuation of a complex instrument is materially influenced by the model chosen. Indeed, it is possible that models using price elementary instruments with the same quality may give rise to different prices for exotic instruments. In these cases, where possible, alternative models are compared, and where necessary, model inputs are subjected to stress tests, thus obtaining useful elements to quantify fair value adjustments, expressed in terms of measurable financial indicators (vega, delta, correlation shift), and periodically reviewed. These fair value adjustments, due to model risks, are part of a Mark to Market Adjustment Policy adopted for the purpose of considering, in addition to model risk described above, also other factors eligible to influence valuation and essentially attributable to:

– high and/or complex risk profile;
– position illiquidity determined by temporary or structural market conditions or in relation to the entity of exchange values held (in case of excessive concentration) and
– valuation difficulties due to the lack of liquid and observable market parameters.

With regard to the above, note that IFRS 13 has not introduced concepts that are inconsistent with current practices. The main new development is represented by the clarification introduced in reference to non-performance risk in determining the fair value of OTC derivatives. This risk includes changes in the counterparty credit rating and changes in the issuer's own credit risk.
In order to comply with the new standard, a new calculation model was developed – the Bilateral Credit Value Adjustment (bCVA) – which not only takes fully into account the effects of changes in the counterparty credit rating (the first subject of the credit risk

adjustment methodology) but also the changes in own credit rating (Debit Value Adjustment - DVA) and identifies a series of refinements to the previous methodology. The bCVA has two addends, calculated by considering the possibility that both counterparties go bankrupt, known as the Credit Value Adjustment (CVA) and Debit Value Adjustment (DVA):

– the CVA (negative) takes into account scenarios whereby the Counterparty fails before the Bank and the Bank has a positive exposure to the Counterparty. In these scenarios the Bank suffers a loss equal to the cost of replacing the derivative;
– the DVA (positive) takes into account scenarios whereby the Bank fails before the Counterparty and has a negative exposure to the Counterparty. In these scenarios the Bank achieves a gain equal to the cost of replacing the derivative.

The bCVA depends on the exposure, probability of default and the Loss Given Default of the counterparties.

For additional details on the Fair Value Policy and the fair value measurement criteria see the disclosure provided in the 2012 Annual Report.

Fair value hierarchy

Accounting portfolios: fair value by level

The table below shows financial assets and liabilities designated at fair value through profit and loss broken down by fair value hierarchy levels.

(millions of euro)

Financial assets / liabilities at fair value	30.06.2013			31.12.2012		
	Level 1	Level 2	Level 3	Level 1	Level 2	Level 3
1. Financial assets held for trading	15,243	39,995	667	12,143	50,579	824
2. Financial assets designated at fair value through profit or loss	32,884	3,620	538	31,944	4,537	406
3. Financial assets available for sale	96,848	4,257	2,839	89,445	5,264	2,500
4. Hedging derivatives	-	8,901	2	-	11,649	2
Total	**144,975**	**56,773**	**4,046**	**133,532**	**72,029**	**3,732**
1. Financial liabilities held for trading	6,389	37,556	408	5,335	46,200	660
2. Financial liabilities designated at fair value through profit or loss	-	29,257	-	-	27,047	-
3. Hedging derivatives	-	8,806	12	-	10,757	19
Total	**6,389**	**75,619**	**420**	**5,335**	**84,004**	**679**

Figures restated, where necessary, considering the changes in the scope of consolidation and discontinued operations.

As shown in the table, level 3 instruments, which represent greater discretion in fair value measurement, still account for a limited percentage (around 2%) of the financial instruments portfolio. As regards the values, compared to the 2012 Annual Report there has been a slight decrease in financial liabilities held for trading, essentially attributable to the decrease in negative fair value of the derivatives and an increase in financial assets associated with the rise in assets available for sale.

More than 70% of financial assets measured at fair value are determined based on market prices, and therefore without any discretion by the valuator.

As required by IFRS 13, the following table provides the fair value of financial assets and liabilities measured at amortised cost.

Fair value of financial assets and liabilities measured at cost	30.06.2013		31.12.2012	
	Book value	Fair value	Book value	Fair value
Investments held to maturity	2,140	2,131	2,147	2,025
Due from banks	31,570	31,478	36,533	36,432
Loans to customers	358,404	361,313	376,625	375,262
Total	**392,114**	**394,922**	**415,305**	**413,719**
Due to banks	67,522	67,055	73,352	72,373
Due to customers	219,565	219,515	218,051	218,029
Securities issued	148,854	147,185	159,307	155,315
Total	**435,941**	**433,755**	**450,710**	**445,717**

Figures restated, where necessary, considering the changes in the scope of consolidation and discontinued operations.

Half-yearly changes in financial assets designated at fair value (level 3)

(millions of euro)

	FINANCIAL ASSETS			
	held for trading	designated at fair value through profit or loss	available for sale	for hedging purposes
1. Initial amount	**824**	**406**	**2,500**	**2**
2. Increases	**493**	**172**	**699**	**-**
2.1 Purchases	304	10	295	-
2.2 Gains recognised in:	76	7	61	-
2.2.1 Income statement	*76*	*7*	*4*	-
- of which capital gains	*62*	*7*	*-*	-
2.2.2 Shareholders' equity	*X*	*X*	*57*	-
2.3 Transfers from other levels	105	88	287	-
2.4 Other increases	8	67	56	-
3. Decreases	**-650**	**-40**	**-360**	**-**
3.1 Sales	-428	-9	-135	-
3.2 Reimbursements	-73	-1	-22	-
3.3 Losses recognised in:	-97	-13	-124	-
3.3.1 Income statement	*-97*	*-13*	*-75*	-
- of which capital losses	*-21*	*-13*	*-73*	-
3.3.2 Shareholders' equity	*X*	*X*	*-49*	-
3.4 Transfers to other levels	-11	-1	-32	-
3.5 Other decreases	-41	-16	-47	-
4. Final amount	**667**	**538**	**2,839**	**2**

"Transfers from other levels" of "Financial assets held for trading" are mainly due to derivative contracts with a positive fair value.

Half-yearly changes in financial liabilities designated at fair value (level 3)

(millions of euro)

	FINANCIAL LIABILITIES		
	held for trading	**designated at fair value through profit or loss**	**for hedging purposes**
1. Initial amount	**660**	**-**	**19**
2. Increases	**46**	**-**	**-**
2.1 Issues	28	-	-
2.2 Losses recognised in:	17	-	-
2.2.1 Income statement	*17*	-	-
- of which capital losses	*16*	-	-
2.2.2 Shareholders' equity	*X*	*X*	-
2.3 Transfers from other levels	-	-	-
2.4 Other increases	1	-	-
3. Decreases	**-298**	**-**	**-7**
3.1 Reimbursements	-	-	-2
3.2 Repurchases	-96	-	-
3.3 Gains recognised in:	-193	-	-5
3.3.1 Income statement	*-193*	-	*-5*
- of which capital gains	*-120*	-	*-5*
3.3.2 Shareholders' equity	*X*	*X*	-
3.4 Transfers to other levels	-	-	-
3.5 Other decreases	-9	-	-
4. Final amount	**408**	**-**	**12**

"Financial liabilities held for trading" refer to derivative contracts with a negative fair value.
Repurchases include the early completion of derivative transactions.

In addition to the transfers relating to financial assets and liabilities measured at level 3 as detailed above, note that the following transfers were made during the first half of 2013:

- from level 1 to level 2:
  - financial assets held for trading for 620 million euro (book value as at 30 June 2013);
  - financial assets available for sale for 357 million euro (book value as at 30 June 2013).
- from level 2 to level 1:
  - financial assets held for trading for 214 million euro (book value as at 30 June 2013);
  - financial assets designated at fair value through profit and loss for 1 million euro (book value as at 30 June 2013);
  - financial assets available for sale for 214 million euro (book value as at 30 June 2013);
  - financial liabilities held for trading for 12 million euro (book value as at 30 June 2013).

Sensitivity analysis for financial assets and liabilities measured at level 3

As required by IFRS 13, for the financial assets and liabilities measured at level 3 fair value the following table indicates the effects of a change in one or more non-observable parameters used in the valuation techniques adopted to determine the fair value.

(thousands of Euro)

Financial assets/liabilities	**Non-observable parameters**	**Sensitivity** (thousands of euro)	**Change in non-observable parameter**
Held for trading and available for sale securities	Credit spread	-35	1 bp
Held for trading and available for sale securities	Other parameters	8	1%
OTC Derivatives - Interest rate	Cap-floor volatility on 12-month Euribor	4	1%
OTC Derivatives - Interest rate	Quanto correlation	-3	0.1
OTC Derivatives - Interest rate	Correlation for spread options between swap rates (7 and 15 yrs)	-274	0.1
OTC Derivatives - Commodity	Correlation between Fuel Oil (F10 MCC_EUR) and EUR/USD exchange rate	2	0.01
OTC Derivatives - Commodity	Volatility for the underlying Power Italia (PW IT Terna)	35	1%
OTC Derivatives - Equity	Correlation between underlying equity baskets	93	0.1
OTC Derivatives - Credit	Correlation by iTRAXX S7 tranche	-	0.1
OTC Derivatives - Credit	Credit spread	-13	10%

The sensitivity analysis of complex credit derivatives also shows a 0.2 million euro decrease in fair value[4] when the following parameters change: risk-neutral probability of default derived from market spreads (10%);
– recovery rate (from 5% to 25%, based on the type of risk of the underlying product);
– correlation between the value of collaterals present in the structure (from 25% to 80%, based on the type of risk of the underlying product);
– expected residual life of the contract (one-year increase over the expected term).

Information on the "Day-one-profit/loss"

Under IAS 39, financial instruments shall be initially recognised at fair value. The fair value of a financial instrument on initial recognition is normally the "transaction price", i.e. the fair value of the consideration given or received in relation to, respectively, financial assets and liabilities.
The fact that, upon initial recognition, the fair value of a financial instrument coincides with the transaction price is always intuitively verifiable in the case of transactions falling under level 1 of the fair value hierarchy. Also in the case of level 2, which is based on quotes that can be derived indirectly from the market (Comparable Approach), the fair value and the price often coincide upon initial recognition. Any differences between the price and the fair value are usually allocated to the so-called commercial margins. Commercial margins are taken to the income statement when the financial instrument is initially measured.
Conversely, with respect to level 3 instruments, which have more discretion in fair value measurement, no definite reference benchmark is available to compare the transaction price with. For the same reason, the calculation of any commercial margin to be taken to the income statement is also difficult. In this event, the instrument is always initially recognised at cost. Subsequent measurement shall not include the difference between cost and fair value identified upon initial recognition (Subsequent or Day-One-Profit - DOP).
This difference shall be recognised in the income statement only when it arises from changes of the factors over which market participants base their valuations when fixing prices (including the time effect). Where the instrument has a definite maturity and no model is available to monitor the changes to the factors over which prices are based, the DOP can be recognised in the income statement systematically over the life of such instrument.
When a level 3 instrument is reclassified to level 2, the residual deferred Day-One-Profits are recognised in the income statement. Similarly, in the event of "on the book" transactions falling under the Bank's investing activities, the Day-One-Profits earned on level 3 transactions (including in the above "on the book" management) are taken to the income statement when the Group entity (the investment bank) carries out transactions which substantially eliminate the risks of the level 3 instrument which generated the DOP.
The above regulation applies only to those instruments which fall in one of the classes which can be recognised at fair value through profit and loss (Fair value Option and Trading book). Indeed, only for the latter, the difference between the transaction price and the fair value would be taken to the income statement upon initial recognition.
The following table shows the amount deferred in the balance sheet, indicating the portion taken to the income statement.

(millions of euro)

1. Initial amount	**35**
2. Increases	**-**
2.1 New transactions	-
3. Decreases	**-16**
3.1 Releases to the income statement	-16
4. Final amount	**19**

[4] This amount is shown net of adjustments to valuations relating to the main input parameters which were already considered to determine the fair value of financial instruments.

STRUCTURED CREDIT PRODUCTS

The first six months of 2013 saw a limited decline in the portfolio on risk positions classified as part of the loan portfolio. As regards the trading book, the increase in exposure during the half-year is largely attributable to the purchase of ABSs by the subsidiary Banca IMI.
The first half of 2013 yielded a positive contribution to profit of 61 million euro, of which 22 million euro from realised profits and 39 million euro from revaluation, and up on the first half of the previous year (+37 million euro). This result is compared with 96 million euro as at 31 December 2012.

The risk exposure to structured credit products amounted to 2,101 million euro as at 30 June 2013 with respect to funded and unfunded ABSs/CDOs, compared to 2,247 million euro as at 31 December 2012, in addition to an exposure of 34 million euro with respect to structured packages (this position was 3 million euro as at 31 December 2012). The reduction in the exposure during the first six months of 2013 was, in relation to financial assets held for trading, associated with the termination of two CDO funded structures included within the "Contagion Area" with a TruPS risk exposure of 54 million euro and of two unfunded Super Senior CDO positions recorded under "Other structured credit products" for 79 million euro. These decreases, however, were largely offset by the increase in risk exposure in European/US ABS/CDOs held by Banca IMI. With regard to the exposure in securities classified under the loan portfolio, on the other hand, a significant decrease was recorded, almost all of which attributable to the Parent Company loan portfolio and for the most part due to disposals.
Lastly, with regard to exposure in packages, the figure of 34 million euro recorded as at 30 June 2013 was entirely due to a substantial improvement in the creditworthiness of the counterparty which led to a positive fair value of the credit derivative.

As at 30 June 2013, the creditworthiness of around 4% of outstanding positions was downgraded. Only 0.2% of these downgradings occurred in the second quarter of 2013. This figure should be compared with the trend recorded last year. In 2012 credit rating downgrades affected around 42% of outstanding positions, with a strongly accentuated trend in the first quarter of 2012 (+26%) and more contained trend in the second, third and fourth quarters of 2012 (+3.5%, +8.9% and +4.2%, respectively).
The situation of the structured credit product portfolio at the end of June 2013 is described by the following indicators:

- 65% of exposure was Investment Grade, in line with the figure as at 31 December 2012;
- 11% had an AAA rating and 30% had an AA rating;
- 35% had a BBB rating or less, in line with the figure as at 31 December 2012;
- approximately 7% of the exposure has a pre-2005 vintage;
- 23% has a 2005 vintage;
- only 6% of exposure related to the US Residential segment, and 80% to the European segment.

In terms of underlying contract types, slightly a little over half the exposure consisted of RMBSs (52%); the remainder consisted of CLOs (16%), CDOs (13%) and ABSs (12%); there were also CMBSs representing 6% of the total.
As concerns valuation methods, of "long" positions, approximately 26% are measured using the mark-to-model (100% of unfunded positions, 22% of funded positions, 100% of the monoline risk and the non-monoline packages), 66% with the comparable approach (70% of funded positions) and 8% are measured using effective market quotes (8% of funded positions). "Short" positions, made up entirely of CMBX and CDS hedges, are all measured using effective market quotes.

In the summary tables provided below, table (a) sets out risk exposure and income statement captions (sum of realised charges and profits, write-downs and write-backs) as at 30 June 2013, compared with the corresponding values recorded as at 31 December 2012.
Table (b) sets out figures related to structured packages, normally made up of an asset (security) whose credit risk is entirely hedged by a specific credit default swap. Risk exposure in the table refers to the protection seller and not to the issuer of the asset hedged.
Values expressed in USD as at 31 December 2012 were translated to euro at an exchange rate of 1.3194 euro per dollar, and as at 30 June 2013 at an exchange rate of 1.308 euro per dollar.

Structured credit products: summary tables

a) Exposure in funded and unfunded ABSs/CDOs

(millions of euro)

Financial assets held for trading	30.06.2013		31.12.2012	
	Risk exposure (*) (including write-downs and write-backs)	**Income Statement** Profits (Losses) on trading	**Risk exposure** (*) (including write-downs and write-backs)	**Income Statement** Profits (Losses) on trading
US subprime exposure	**9**	**-1**	**9**	**-3**
Contagion area	**-18**	**1**	**33**	**65**
- Multisector CDOs (1)	-18	1	-21	18
- Alt-A	-	-	-	-
- TruPS	-	-	54	47
- Prime CMOs	-	-	-	-
Other structured credit products	**955**	**30**	**844**	**44**
- European/US ABS/CDOs	905	10	716	31
- Unfunded super senior CDOs	50	20	128	16
- Other unfunded positions	-	-	-	-3
Total	**946**	**30**	**886**	**106**
in addition to:				
Positions of funds	-	-	-	11
Total Financial assets held for trading	**946**	**30**	**886**	**117**

(millions of euro)

Loans	30.06.2013		31.12.2012	
	Risk exposure (**) (including write-downs and write-backs)	**Income Statement**	**Risk exposure** (**) (including write-downs and write-backs)	**Income Statement**
US subprime exposure	**2**	**-**	**3**	**-**
Contagion area	**34**	**1**	**43**	**1**
- Multisector CDOs	2	1	8	1
- Alt-A	22	-	23	-
- TruPS	-	-	-	-
- Prime CMOs	10	-	12	-
Other structured credit products	**1,119**	**-7**	**1,315**	**-1**
- Funded European/US ABS/CDOs	904	-11	1,017	-8
- Funded super senior CDOs	215	4	298	7
- Other Romulus funded securities	-	-	-	-
Total	**1,155**	**-6**	**1,361**	**-**
in addition to:				
Positions of funds	-	-	-	-
Total Loans	**1,155**	**-6**	**1,361**	**-**
TOTAL	**2,101**	**24**	**2,247**	**117**

(1) The short position of the Multisector CDO segment was generated as a result of the closing of almost all the risk positions which had been included from the beginning, and the maintenance of derivatives on indices for the operational hedging of said positions. More specifically, these comprise 11 million euro in risk exposure hedged by 29 million euro in "short" operational positions.

(*) The column "Risk exposure" sets out: for securities, fair value; for derivatives, the nominal value of the contract, net of write-downs and write-backs recorded at reference date. Such amounts correspond, for "long" positions, to the maximum potential loss (in the event of a 100% default and a recovery rate of 0). For "short" positions, vice versa, they indicate the maximum potential gain (in the same scenario in terms of default and recovery levels).

(**) For assets reclassified to loans, exposure to risk is provided by the carrying amount of the security, equal to its fair value at the reclassification date, plus accrued interest calculated at the effective interest rate net of net value adjustments to the portfolio.

b) Exposure in packages

(millions of euro)

	30.06.2013		31.12.2012	
	Credit exposure to monoline insurers (CDS fair value post write-down for CRA)	**Income Statement** Profits (Losses) on trading	**Credit exposure to monoline insurers** (CDS fair value post write-down for CRA)	**Income Statement** Profits (Losses) on trading
Monoline risk	33	37	-	-21
Non monoline packages	1	-	3	-
TOTAL	**34**	**37**	**3**	**-21**

From an income statement perspective, structured credit products generated a net income of +61 million euro as at 30 June 2013 compared to +96 million euro for 2012.
The exposure in funded and unfunded ABSs/CDOs had an effect on "Profits (Losses) on trading – Caption 80" of 30 million euro. The profit on this segment was a result of the effects of:

– unfunded Super Senior CDO positions included in "Other structured credit products" for +20 million euro, of which 18 million euro deriving from termination of the two structures mentioned previously and 2 million euro from revaluation of positions outstanding;
– European and US funded ABSs/CDOs (+10 million euro), entirely attributable to the subsidiary Banca IMI and including -1 million euro attributable to losses realised on the partial disposal of the trading book and +11 million from revaluation of positions outstanding;
– instruments included in the "Contagion Area" (+1 million euro) and particularly in the Multisector CDO segment;
– the contribution of the subprime exposure for -1 million euro.

The securities reclassified to the loan portfolio had an overall negative impact on the income statement of 6 million euro as at 30 June 2013. This result is the combination of the 6 million euro in profits realised on the sale of positions and -12 million in impairment losses on securities included in the portfolio.
As at 30 June 2013 the loan portfolio contained ABSs issued by parties resident in EU countries in situations of financial difficulty (known as "PIGS"). In particular, these consist of:

– 200 million euro in nominal value of securities issued by parties resident in Spain; as at 30 June 2013 these securities had a book value of 185 million euro and a fair value of 155 million euro;
– 66 million euro in nominal value of securities issued by parties resident in Portugal; as at 30 June 2013 these securities had a book value of 59 million euro and a fair value of 51 million euro;
– 8 million euro in nominal value of securities issued by parties resident in Greece; as at 30 June 2013 these securities had a book value of 5 million euro and a fair value of 3 million euro;
– 3 million euro in nominal value of securities issued by parties resident in Ireland; as at 30 June 2013 these securities had a book value of 2 million euro and a fair value of 1 million euro.

The "Monoline risk" and "Non-monoline packages" made a positive contribution of 37 million euro to "Profits (Losses) on trading – caption 80" as at 30 June 2013, up strongly on the -21 million euro recorded at the end of 2012. The segment trend reflects the spread volatility for the counterparty on which this exposure is concentrated.

It should be noted that the "Structured credit products" aggregate was identified in 2007, immediately following the outbreak of the "subprime phenomenon" and, in disclosure to the market, has been kept essentially constant.
As at 30 June 2013, the aggregate included bonds reclassified as loans, which are summarised in the tables below.

(millions of euro)

	Nominal value	**Risk exposure** (*) (including write-downs and write-backs)	**Fair value as at 30.06.2013**	**Benefit from the reclassification as at 30.06.2013**	**Effect on Shareholders' Equity**
Reclassified securities:					
- from financial assets available for sale to loans	178	134	83		51
- from financial assets held for trading to loans	923	809	691	118	
Total Securities reclassified to loans	**1,101**	**943**	**774**	**118**	**51**
Securities classified under loans on initial recognition	217	212			
Total securities classified under loans on initial recogni	**217**	**212**			
TOTAL LOANS	**1,318**	**1,155**	**774**	**118**	**51**

(*) For assets reclassified to loans, exposure to risk is provided by the carrying amount of the security, equal to fair value at the reclassification date, plus accrued interest calculated at the effective interest rate net of net value adjustments to the portfolio.

(millions of euro)

Negative economic effect without reclassification for 2008	-299
Negative economic effect without reclassification for 2009	-7
Positive economic effect without reclassification for 2010	117
Negative economic effect without reclassification for 2011	-25
Positive economic effect without reclassification for 2012	67
Positive economic effect without reclassification for 1st half 2013	29
BENEFIT FROM THE RECLASSIFICATION AS AT 30.06.2013	**-118**

In addition to the structured credits identified during the subprime crisis, the Group continues to invest in this type of security as part of its normal customer lending operations. In particular, securities were recorded in the loan portfolio of the conduit Duomo for a nominal value of 1,111 million euro, with underlyings originated in recent years, but not impacted by the 2007 crisis. As at 30 June 2013, there were no signs of impairment of the collateral of the structured products in question.

INFORMATION ON ACTIVITIES PERFORMED THROUGH SPECIAL PURPOSE ENTITIES (SPEs)

For the purpose of this analysis, legal entities established to pursue a specific, clearly defined and limited objective are considered Special Purpose Entities (raising funds on the market, acquiring/selling/managing assets both for asset securitisations, acquisition of funding through self-securitisations and the issue of covered bonds (CBs), developing and/or financing specific business initiatives, undertaking leveraged buy-out transactions, or managing credit risk inherent in an entity's portfolio).
The sponsor of the transaction is normally an entity which requests the structuring of a transaction that involves the SPE for the purpose of achieving certain objectives. In some cases the Bank is the sponsor and establishes a SPE to achieve one of the objectives cited above. There have not been any changes in the consolidation criteria compared to those reported in the 2012 financial statements.

Funding SPEs

These are entities incorporated abroad to raise funds on specific markets. The SPEs issue financial instruments, guaranteed by Intesa Sanpaolo, and transfer the funds raised to the Parent Company. The change in Italian law which enables the Parent Company Intesa Sanpaolo to directly issue hybrid notes eliminated the funding activities carried out through these methods. Moreover, the difficulty in achieving significant funding volumes persists due to an unsuitable short-term rating.
There were no changes in the investments in this type of SPE compared to 31 December 2012.

SPEs for insurance products

These are entities (UCITS) established for the purpose of investing internal funds of unit-linked and index-linked products of the Group's insurance companies. The latter retain the majority of the risks and rewards of the companies in question and, accordingly, are consolidated pursuant to IAS 27/SIC 12.
Compared to 31 December 2012, the first half of 2013 saw a decrease in net assets held by this type of entity to around 16.7 billion euro, of which 6.4 billion euro relative to funds managed by Fideuram Gestions. The corresponding figure as at 31 December 2012 was 22 billion euro (of which approximately 6.7 billion euro relative to funds managed by Fideuram Gestions).

Securitisation SPEs

These are SPEs that enable an entity to transfer assets from its balance sheet assets, transforming them in securities which can be placed on the market. The crisis which began in 2007 caused a sharp slowdown in this type of transactions, which were replaced by structures used for raising funds through securitisations of a portion of assets owned by the transferor. In particular, this involves the spin-off of a package of balance sheet assets (generally loans) and its subsequent transfer to a vehicle which, to finance the purchase, issues securities later placed on the market (traditional securitisations) or purchased in full by the issuer (self-securitisations). In the first case, the funds raised in this way are reversed to the transferor, whereas the commitments to the subscribers are met using the cash funds generated by the loans sold. This category also includes SPEs used by Intesa Sanpaolo to implement the covered bond issue programme.
SPEs of this type, which were included in the scope of consolidation as at 30 June 2013, are the same reported in the financial statements as at 31 December 2012. The securitised assets of this type of vehicle are represented by performing mortgages, non-performing mortgages and performing loans deriving from lease contracts.
With regard to the vehicles used for securitisation or self-securitisation transactions now terminated, note the liquidation of the Spit 2 vehicle during the first half of 2013, and in July 2013 the merger by incorporation of the vehicles Intesa Sec 2 S.r.l. and Adriano Finance S.r.l. into Intesa Sanpaolo.
As at 30 June 2013 the Intesa Sanpaolo Group had one self-securitisation transaction outstanding, implemented through the vehicle Adriano Lease SEC S.r.l.. The Sanvitale 1 and Sanvitale 2 self-securitisations reported in the 2012 financial statements have terminated with retrocession of the loans and settlement of the swaps respectively in March 2013 and in January 2013.
As regards the Covered Bond issue programme, in the first quarter of 2013, as part of the programme secured by ISP CB Ipotecario S.r.l., Intesa Sanpaolo arranged an issue for 1 billion euro targeting professional investors and international financial intermediaries. This was a 12-year fixed-rated CB, listed on the Luxembourg Stock Exchange, which was assigned an A2 rating by Moody's.
In April, as part of the programme secured by ISP CB Pubblico S.r.l., a floating-rate issue was arranged for a nominal 2 billion euro with an approximately 2-year maturity. Listed on the Luxembourg Stock Exchange and rated A3 by Moody's, the securities were fully subscribed by the Parent Company Intesa Sanpaolo and are eligible on the Eurosystem.

With reference to the Multioriginator programme, note that as at 30 June 2013 the collateralisation of the issues is represented not only by mortgages granted by Intesa Sanpaolo, Banco di Napoli and Cassa di Risparmio del Veneto, but also by mortgages granted by Banca dell'Adriatico. The sale of assets to the vehicle totalled approximately 1.1 billion euro.
In June, the following issues were arranged under the Multioriginator programme secured by ISP OBG S.r.l.:
- the first, floating rate and with an approximately 2-year maturity, for a nominal 1.5 billion euro;
- the second, floating rate and with an approximately 7-year maturity, for a nominal 800 million euro.

Both issues are unrated, were fully subscribed by Intesa Sanpaolo and are listed on the Luxembourg Stock Exchange.

Financial Engineering SPEs

These SPEs carry out investment and funding transactions that achieve better risk/return combinations than those generated by standard transactions, through their special structures aimed at optimising accounting, tax and/or regulatory aspects. These structures have been set up to respond to the needs of primary customers and provide solutions that offer financing at competitive interest rates and investments with higher returns.
As at 30 June 2013 the vehicle Lunar Funding was the only vehicle of its kind included in the scope of consolidation.

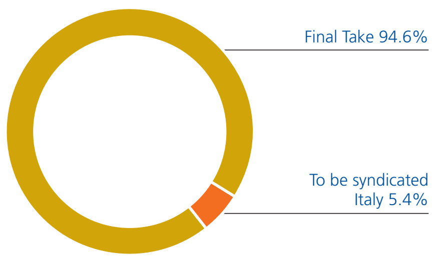
Other unconsolidated Special Purpose Entities

With regard to the other unconsolidated SPEs (Project Financing, Asset Backed and Credit Derivatives) reference should be made to the financial statements as at 31 December 2012. For the Asset Backed SPEs in which the Group has the majority of voting rights, held by just one international subsidiary, total assets amounted to 41 million euro (63 million euro in December 2012).
For operations involving the vehicles used for Leveraged & Acquisition Finance transactions a description is provided in the sections below.

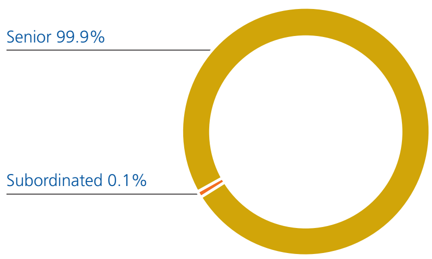
LEVERAGED FINANCE TRANSACTIONS

Since there is no univocal and universally agreed-upon definition of leveraged finance transactions, Intesa Sanpaolo decided to include in this category the exposures (loans granted and disbursed in relation to structured financing operations, normally medium/long term) to legal entities in which the majority of share capital is held by private equity funds.
These are mainly positions in support of Leveraged Buy Out projects (therefore with high financial leverage), i.e. linked to the full or partial acquisition of companies through recourse to SPEs created for this purpose. After acquisition of the target company's shares/quotas package, these SPEs are normally merged into the target. The target companies generally have good economic prospects, stable cash flows in the medium term and low original leverage levels. Intesa Sanpaolo has financed entities of this type, as normal borrowers, without acting as sponsor.
None of these SPEs is consolidated, since the guarantees to support the transaction are solely instrumental for the granting of the financing and are never directed to the acquisition of direct or indirect control over the vehicle.
As at 30 June 2013, 131 transactions for a total amount granted of 3,704 million euro met the above definition.
These exposures are classified under the loans portfolio. They also include the portions of syndicated loans underwritten or under syndication. In line with disclosure requirements, breakdown of exposures by geographical area, economic sector and by level of subordination is set out below.

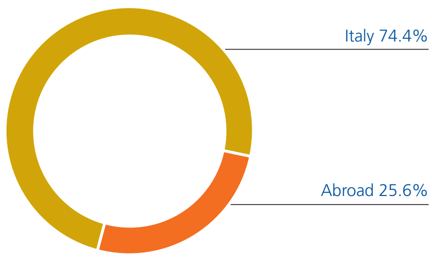
Breakdown by type of risk



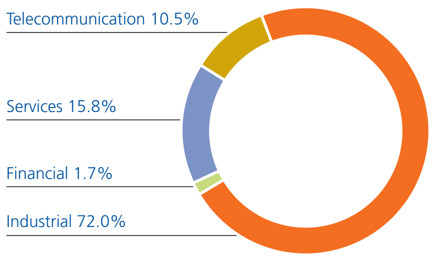
Breakdown by subordination level



Breakdown by geographical area



Breakdown by economic sector



INFORMATION ON INVESTMENTS IN HEDGE FUNDS

The hedge fund portfolio as at 30 June 2013 totalled 710 million euro, compared to the 696 million euro recorded in December 2012. The positive difference is associated with the assessment effect on outstanding positions, partly offset by disposals during the period, and with the revaluation of positions expressed in foreign currencies.

As at the same date, there was an overall profit of 25 million euro from investments in this segment, compared to 28 million euro recorded at the end of the first half of 2012.

The 25 million euro of net profit, recognised as at 30 June 2013 under "Profits (Losses) on trading – caption 80", included:

- 20 million euro from net revaluation of positions outstanding as at the end of June 2013;
- 5 million euro representing net profit realised from disposals.

Net write-ups on the final residual amount (20 million euro) were spread across 35 positions, 23 of which with capital gains (30 million euro) and 12 with capital losses (10 million euro).

The portfolio's overall strategy remained geared towards benefiting from the occurrence of specific corporate events, which are generally independent from the general trend, thus avoiding the spikes in volatility that also characterised the first half of 2013.

INFORMATION ON TRADING TRANSACTIONS IN DERIVATIVES WITH CUSTOMERS

Considering only relations with customers, as at 30 June 2013, the Intesa Sanpaolo Group, in relation to derivatives trading with retail customers, non-financial companies and public entities (therefore excluding banks, financial and insurance companies), presented a positive fair value, not having applied netting agreements, of 6,030 million euro (7,314 million euro as at 31 December 2012). The notional value of such derivatives totalled 54,144 million euro (55,865 million euro as at 31 December 2012). Of these, the notional value of plain vanilla contracts was 49,017 million euro (50,168 million euro as at 31 December 2012), and of structured contracts was 5,127 million euro (5,697 million euro as at 31 December 2012).

Please note that the positive fair value of structured contracts outstanding with the 10 customers with the highest exposures was 706 million euro (516 million euro as at 31 December 2012). The same indicator, referred to the total contracts with a positive fair value, was 4,213 million euro.

Conversely, negative fair value determined with the same criteria, for the same types of contracts and with the same counterparties, totalled 666 million euro as at 30 June 2013 (1,054 million euro as at 31 December 2012).

The notional value of such derivatives totalled 20,227 million euro (15,701 million euro as at 31 December 2012). Of these, the notional value of plain vanilla contracts was 18,453 million euro (13,743 million euro as at 31 December 2012), and of structured contracts was 1,774 million euro (1,958 million euro as at 31 December 2012).

The fair value of derivative financial instruments stipulated with customers was determined considering, as for all other OTC derivatives, the creditworthiness of the single counterparty ("Bilateral Credit Value Adjustment"). With regard to contracts outstanding as at 30 June 2013, this led to a positive effect of 9 million euro being recorded under "Profits (Losses) on trading" in the income statement.

As regards the means of calculation, for the various methodologies used in the determination of the fair value of financial instruments see the specific paragraphs in this chapter.

Please note that contracts made up of combinations of more elementary derivative instruments have been considered "structured" and that the aforesaid figures do not include fair value of derivatives embedded in structured bond issues as well as the relative hedges agreed by the Group.

OPERATIONAL RISKS

Operational risk is defined as the risk of suffering losses due to inadequacy or failures of processes, human resources and internal systems, or as a result of external events. Operational risk includes legal risk, that is, the risk of losses deriving from breach of laws or regulations, contractual, out-of-contract responsibilities or other disputes; strategic and reputation risks are not included.
The Intesa Sanpaolo Group has for some time defined the overall operational risk management framework by setting up a Group policy and organisational processes for measuring, managing and controlling operational risk.
With regard to Operational Risk, the Group has adopted the Advanced Measurement Approaches (AMA – internal model) to determine the associated capital requirement for regulatory purposes:

- effective from 31 December 2009, for an initial set including the Organisational Units, Banks and Companies of the Banca dei Territori Division (excluding network banks belonging to Cassa di Risparmio di Firenze Group, but including Casse del Centro), Leasint, Eurizon Capital and VUB Banka;
- effective from 31 December 2010, for a second set of companies within the Corporate and Investment Banking Division, in addition to Setefi, the remaining banks of the Cassa di Risparmio di Firenze Group and PBZ Banka;
- effective from 31 December 2011, for a third set including Banca Infrastrutture Innovazione e Sviluppo. The full demerger of the Bank in favour of the Parent Company Intesa Sanpaolo and Leasint was completed in December 2012;
- effective from 30 June 2013, for a fourth scope including several companies of the Banca Fideuram group (Banca Fideuram, Fideuram Investimenti, Fideuram Gestions, Fideuram Asset Management Ireland and Sanpaolo Invest) and two international subsidiaries of VUB Banka (VUB Leasing and Consumer Finance Holding).

The remaining companies, currently using the Standardised approach (TSA), will migrate progressively to the Advanced Measurement approaches starting from the end of 2014, based on the roll-out plan presented to the Management and Supervisory Authorities.

The control of the Group's operational risks was attributed to the Management Board, which identifies risk management policies, and to the Supervisory Board, which is in charge of their approval and verification, as well as of the guarantee of the functionality, efficiency and effectiveness of the risk management and control system.
The tasks of the Group Compliance and Operational Risk Committee include periodically reviewing the overall operational risk profile, authorising any corrective measures, coordinating and monitoring the effectiveness of the main mitigation activities and approving operational risk transfer strategies.

The Group has a centralised function within the Risk Management Department for management of the Group’s operational risk. This function is responsible for the definition, implementation, and monitoring of the methodological and organisational framework, as well as for the measurement of the risk profile, the verification of mitigation effectiveness and reporting to Top Management.
In compliance with current requirements, the individual Organisational Units are responsible for identifying, assessing, managing and mitigating risks. Specific officers and departments have been identified within these business units to be responsible for Operational Risk Management (structured collection of information relative to operational events, scenario analyses and evaluation of the business environment and internal control factors).

The Integrated self-assessment process, conducted on an annual basis, allows the Group to:

- identify, measure, monitor and mitigate operational risk through identification of the main operational problem issues and definition of the most appropriate mitigation actions;
- create significant synergies with the specialised functions of the Human Resources and Organisation Department that supervise the planning of operational processes and business continuity issues and with control functions (Compliance and Internal Auditing) that supervise specific regulations and issues (Legislative Decree 231/01, Law 262/05) or conduct tests of the effectiveness of controls of company processes.

The Self-assessment process identified a good overall level of control of operational risks and contributed to enhancing the diffusion of a business culture focused on the ongoing control of these risks.
The process of collecting data on operational events (in particular operational losses, obtained from both internal and external sources) provides significant information on the exposure. It also contributes to building knowledge and understanding of the exposure to operational risk, on the one hand, and assessing the effectiveness or potential weaknesses of the internal control system, on the other hand.
The internal model for calculating capital absorption is conceived in such a way as to combine all the main sources of quantitative (operational losses) and qualitative information (self-assessment).
The quantitative component is based on an analysis of historical data concerning internal events (recorded by organisational units, appropriately verified by the central function and managed by a dedicated IT system) and external events (by the Operational Riskdata eXchange Association).
The qualitative component (scenario analyses) focuses on the forward-looking assessment of the risk exposure of each unit and is based on the structured, organised collection of subjective estimates expressed directly by management (subsidiaries, Parent Company’s business areas, the Corporate Centre) with the objective of assessing the potential economic impact of particularly severe operational events.
Capital-at-risk is therefore identified as the minimum amount at Group level required to bear the maximum potential loss (worst case); Capital-at-risk is estimated using a Loss Distribution Approach model (actuarial statistical model to calculate the Value-at-risk of operational losses), applied on quantitative data and the results of the scenario analysis assuming a one-year estimation period, with a confidence level of 99.90%; the methodology also applies a corrective factor, which derives from the qualitative analyses of the risk level of the business environment, to take account of the effectiveness of internal controls in the various organisational units.

Operational risks are monitored by an integrated reporting system, which provides Management with support information for the management and/or mitigation of the operational risk.
In order to support the operational risk management process on a continuous basis, a structured training programme was fully implemented for employees actively involved in this process.

In addition the Group activated a traditional operational risk transfer policy (to protect against offences such as employee disloyalty, theft and theft damage, cash and valuables in transit losses, computer fraud, forgery, earthquake and fire, and third-party liability), which contributes to mitigating exposure to operational risk. At the end of June, in order to allow optimum use of the available operational risk transfer tools, pursuant to applicable regulations, the Group stipulated an innovative insurance coverage policy (a second layer policy) known as Operational Risk Insurance Programme, which offers additional coverage to traditional (first layer) policies, significantly increasing the limit of liability, effectively transferring the risk of significant operational losses to the insurance market. The internal model's insurance mitigation component was approved by the Bank of Italy in June 2013 with immediate effect of its benefits on operations and on the capital requirements.

To determine its capital requirements, the Group employs a combination of the methods allowed under applicable regulations. The capital absorption resulting from this process amounts to 1,815 million euro as at 30 June 2013, down compared to 31 March 2013 (2,059 million euro). Contributing to this decrease were the benefit from the introduction of the Operational Risk Insurance Programme, the change in the AMA scope and on-going updates in the historical series of loss data, both within the Group and in the ORX Consortium, which form part of the AMA models in relation to the LDA component.

Legal risks

Legal risks are thoroughly analysed by the Parent Company and Group companies. Provisions are made to the Allowances for risks and charges when there are legal obligations for which it is probable that funds will be disbursed and where the amount of the disbursement may be reliably estimated.
During the first six months of 2013, no new significant legal procedures were commenced and there were no important developments with respect to those underway. Reference should therefore be made to the Notes to the 2012 Financial Statements for a detailed description of litigation regarding anatocism, investment services and other significant proceedings and litigation.

There was only a marginal update to the Intesa Sanpaolo (formerly Banca OPI, then Banca Infrastrutture Innovazione e Sviluppo) and Piemonte Regional Government litigation, regarding a decision of the High Court of Justice of England and Wales reached in July. In 2006 the Piemonte Regional Government issued two bond loans for a total of 1,856 million euro, of which 430 million euro was subscribed by the former Banca OPI (the remainder was subscribed by two leading international financial institutions). Under the terms of these issues, the Regional Government finalised two derivative financial instrument transactions subscribed by the former Banca OPI for a notional amount of 628 million euro, together with the other two lending banks.
At the beginning of 2011 the Regional Government launched verification and comparison proceedings with the banks concerned to assess the financial and legal profiles of the swap transactions. Despite the clarifications provided concerning the technical and regulatory appropriateness of the contracts, the Regional Government subsequently launched self-protection proceedings for revocation of all the administrative documents underlying the derivative contracts (finalised between the Regional Government and the banks), which ended in January 2012 with the cancellation thereof.
The banks appealed against said measure before the Piemonte Regional Administrative Court which, with judgement of 21 December 2012, ruled that it did not have jurisdiction to decide on the matter, recognising the jurisdiction, provided by the contract, of the UK civil courts and thus, in substance, denying the effectiveness of the self-protection measure.
The Regional Government appealed against the first instance ruling, and the Banks intervened to challenge acceptance of the appeal. The hearing to discuss the merits before the State Council was held on 23 July 2013 and a decision is pending.
Back in August 2011, the banks petitioned the High Court of Justice of England and Wales to ascertain the validity and correctness of the contracts entered into with the Regional Authorities. The UK Court, which had jurisdiction over the matter, accepted the requests in July 2012.
As the Regional Government has failed to make netting payments on the swap contracts from May 2012 onwards, despite repeated demands to do so, in February 2013 – after the Piemonte Regional Administrative Court decision – the Banks called upon the High Court of Justice of England and Wales to order settlement of the outstanding netting payments by the Piemonte Regional Government, which appeared before the court. The Court's decision, filed on 16 July 2013, was in the Banks' favour.

With regard to new legal procedures, note only that in January 2013 – before the Milan Court of Appeal – Alberto Tambelli summarised a judgment of the Court of Cassation, claiming compensation for damages in terms of lost earnings for a total of approximately 110 million euro. The proceedings originate from futures transactions performed in 1994 with the Milan branch of the former Banca Popolare dell'Adriatico (now Banca dell'Adriatico) resulting in a capital loss for Mr. Tambelli. On termination of both levels of proceedings brought against the Bank, Mr. Tambelli obtained reimbursement of the damages suffered but both the Ordinary Court and the Milan Court of Appeal denied compensation for other damages associated with loss of earnings which, in Mr. Tambelli's opinion, could have been achieved in the period in which he was deprived of availability of the sums lost in the aforementioned financial transactions. The Court of Appeal judgment was challenged by both parties before the Court of Cassation, which by decision dated 1 October 2012 rejected the Bank's appeal, thereby finalising the order to compensate damages resulting from the loss of capital invested (which had in any event already been paid to Mr. Tambelli in 2004) and, vice versa, accepted Mr. Tambelli's claim, considering that – unlike the decision of the Milan Court of Appeal – the further claims for compensation for loss of earnings were not time-barred and their merits could therefore be assessed in new proceedings before a different bench by the Milan court.
As a result of the corporate affairs affecting Banca Popolare dell'Adriatico, the new proceedings were brought against Intesa Sanpaolo, as universal successor to Banca dell'Adriatico, and also against the latter as specific successor of the former bank.
At the hearing of 23 April 2013, the judge, without considering Mr. Tambelli's preliminary claims, ordered the case to be decided by the Bench and set the date for the evidentiary hearing as 9 February 2016.
As this initiative is believed to be without foundation it was not considered necessary to allocate provisions.

Lastly, note that Istituto per il Credito Sportivo (in which Intesa Sanpaolo has a 10.81% interest) was placed under extraordinary administration on 28 December 2011, the procedure for which has been postponed to the end of August 2013. The special administrators have aimed to reopen the case regarding the legal nature of a State-contributed fund, requesting review of the

allocation of net income to investors and of the regulation on such matters introduced in 2005.
Following their request, by notice received on 13 November 2012 the Prime Minister's Office opened proceedings for cancellation of the ICS Articles of Association of 2005 and of the related approval decree.
On 12 March 2013 the Prime Minister's Office announced adoption by the "Ministry for Regional Affairs, Tourism and Sport" and the "Ministry for Cultural Heritage and Activities", in concert with the "Ministry for the Economy and Finance", of the Interministerial Decree of 6 March 2013 declaring cancellation of the ICS Articles of Association of 2005. Together with other non-public investors of Istituto per il Credito Sportivo (collectively representing more than 72% of the capital), the Bank challenged the cancellation measure before the Lazio Administrative Court and the hearing is pending. In this respect, the Bank, aided by a qualified external expert, believes that the exposure currently relates only to risks considered remote.

Tax litigation

With regard to pending tax litigation and the related risks and provisions, detailed information is provided in the Notes to the 2012 consolidated financial statements.
As regards developments as at 30 June 2013, it is worth mentioning that the Milan Guardia di Finanza has extended its tax inspection – which already led to litigation on 2007 findings – to the years 2008 to 2011 in relation to a series of capitalisation transactions performed by the merged banks Banca Commerciale Italiana, Banca Intesa, Sanpaolo IMI and Banca IntesaBCI involving the issue of preference shares through international subsidiaries (LLCs) resident in Delaware (USA).
A new series of disputes arising in the second quarter of 2013 refers to loans granted abroad, which were initially claimed to be a "misuse of rights" and affecting substitute tax and later, based on the assumption that they were in any event considered established in Italy whenever the essential elements of the related term sheet is found in other documentation discovered in Italy with a date prior to that of the contract signed abroad.
For both cases, at present there are no elements that would call for the allocation of specific provisions.
With regard to the other Group companies, note that Leasint has adopted the tax settlement proposal to close the position reported at year end in relation to certain real estate leasing transactions performed in 2006.
With regard to the main proceedings outcomes during the reporting period, of particular note, concerning the Parent Company, is the fact that the Agenzia delle Entrate has filed appeal before the Court of Cassation against the favourable rulings of the Turin Regional Tax Committee regarding, respectively, the stamp duty in relation to the compulsory accounting figures and recognition of the tax relevance of loans deriving from repurchase agreements to the effect of calculation of the ceiling of deductibility of the write-down of loans.
Lastly, with regard to the other Italian Group companies, note the 100% favourable outcome of Leasint's first instance proceedings challenging the unlawful nature of VAT findings for 2005 and 2006 in relation to the vexed question, repeatedly reported previously, of the tax rate applicable in nautical leasing.

INSURANCE RISKS

Life business

The typical risks of the life insurance portfolio may be divided into three main categories: premium risks, actuarial and demographic risks and reserve risks.
Premium risks are managed initially during definition of the technical features and product pricing, and over the life of the instrument by means of periodic checks on sustainability and profitability (both at product level and at portfolio level, including liabilities).
Actuarial and demographic risks by means of systematic statistical analysis of the evolution of liabilities in its own contract portfolio, divided by risk type, and through simulations of expected profitability of the assets hedging technical reserves.
Reserve risk is guarded against through the exact calculation of mathematical reserves, with a series of detailed checks as well as overall verifications, by comparing results with the estimates produced on a monthly basis.
The mathematical reserves are calculated on almost the entire portfolio, on a contract-by-contract basis, and the methodology used to determine the reserves takes account of all the future commitments of the company.

Non-life business

The risks of the non-life insurance portfolio are essentially premium risk and reserve risk.
Premium risks are managed initially during definition of the technical features and product pricing, and over the life of the instrument by means of periodic checks on sustainability and profitability (both at product level and at portfolio level, including liabilities).
Reserve risk is guarded against through the exact calculation of technical reserves.

Financial risks

In line with the growing focus in the insurance sector on the issues of value, risk and capital in recent years, a series of initiatives has been launched with the objective of both strengthening risk governance and managing and controlling financial risks.
With reference to investment portfolios, set up both as coverage of obligations with the insured and in relation to free capital, the Investment Framework Resolution is the main control and monitoring instrument for market and credit risks.
The Resolution defines the goals and the operating limits that are needed to distinguish the investments in terms of eligible assets and asset allocation, breakdown by rating classes and credit risk, concentration risk by issuer and sector, market risks, in turn measured in terms of sensitivity to variations in risk factors and Value at Risk (VaR).

Investment portfolios

The investments of the insurance companies of Intesa Sanpaolo Group (Intesa Sanpaolo Vita, Intesa Sanpaolo Assicura, Intesa Sanpaolo Life, Fideuram Vita and Bentos Assicurazioni) are made with their free capital and to cover contractual obligations with customers. These refer to traditional revaluable life insurance policies, Index- and Unit-linked policies, pension funds and non-life policies.
As at 30 June 2013, the investment portfolios of Group companies, recorded at book value, amounted to 85,330 million euro. Of these, the part of 50,604 million euro relates to traditional revaluable life policies, the financial risk of which is shared with the policyholders by virtue of the mechanism whereby the returns on assets subject to segregated management are determined, non-life policies and free capital. The other component, whose risk is borne solely by the policyholders, consists of investments related to Index-linked policies, Unit-linked policies and pension funds and amounted to 34,726 million euro.

Considering the various types of risks, the analysis of investment portfolios, described below, concentrates on the assets held to cover traditional revaluable life policies, non-life policies and free capital.
In terms of breakdown by asset class, net of derivative financial instruments, 94.1% of assets, i.e. approximately 47,905 million euro, were bonds, whereas assets subject to equity risk represented 1.3% of the total and amounted to 643 million euro. The remainder (2,343 million euro) consisted of investments relating to UCI, Private Equity and Hedge Funds (4.6%).
The carrying value of derivatives came to approximately -288 million euro, almost entirely relating to hedging derivatives, with effective management derivatives[5] only amounting to around -31 million euro.

At the end of the first six months of 2013, investments made with the free capital of Intesa Sanpaolo Vita and Fideuram Vita amounted to approximately 2,353 million euro at market value, and presented a risk in terms of VaR (99% confidence level, 10-day holding period) of approximately 105 million euro.
The modified duration of the bond portfolio, or the synthetic financial term of assets, is approximately 5.2 years. The reserves relating to the revaluable contracts under Separate Management have an average modified duration of approximately 5.7 years. The related portfolios of assets have a modified duration of around 4.4 years.
The breakdown of the bond portfolio in terms of fair value sensitivity to interest rate changes showed that a +100 basis points parallel shift in the curve leads to a decrease of approximately 2,351 million euro. On the basis of this hypothetical scenario, the value of hedging derivatives in the portfolio undergoes an approximate 113 million euro rise which partly offsets the corresponding loss on the bonds.
The distribution of the portfolio by rating class is as follows. AAA/AA bonds represented approximately 4.1% of total investments and A bonds approximately 5.2%. Low investment grade securities (BBB) were approximately 82.4% of the total and the portion of speculative grade or unrated was minimal (approximately 2.4%).
A considerable portion of the BBB area is made up of securities issued by the Republic of Italy.

[5] ISVAP Regulation 36 of 31 January 2011 on investments defines “effective management derivatives” as all derivatives aimed at achieving pre-established investment objectives in a faster, easier, more economical or more flexible manner than would have been possible acting on the underlying assets.

The analysis of the exposure in terms of the issuers/counterparties produced the following results: securities issued by Governments and Central banks approximately made up 72.4% of the total investments, while financial companies (mostly banks) contributed almost 17.5% of exposure and industrial securities made up approximately 4.1%.

At the end of the first half of 2013, the fair value sensitivity of bonds to a change in issuer credit rating, intended as a market credit spread shock of +100 basis points, was 2,508 million euro, with 2,066 million euro due to government issuers and 442 million euro to corporate issuers (financial institutions and industrial companies).