Bank Hapoalim

Report on Risks

Pillar 3 Disclosure and Additional Information Regarding Risks

as at June 30, 2019

Q2

bank hapoalim

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This is a translation of the Hebrew report and has been prepared for convenience only.
In case of any discrepancy, the Hebrew version will prevail.

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Report on Risks

We are honored to present the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at June 30, 2019 (hereinafter: the "Report on Risks" or the "Report").

The information in this Report, as required by the reporting directives of the Bank of Israel, includes disclosure requirements issued by the Basel Committee and risk disclosure requirements based on other sources, including disclosure requirements issued by the Financial Stability Forum (FSF) and disclosure requirements issued by a task force established by the Financial Stability Board (FSB) in order to improve risk disclosure at banking corporations.

Further to the statements in Section 2.6.1 of the Report of the Board of Directors and Board of Management of the Bank for 2018 concerning the Bank's preparations for separation from the Isracard Group, pursuant to the requirements of the Law for Increasing Competition and Reducing Concentration in the Banking Market in Israel (Legislative Amendments), 2017 (the "Law for Increasing Competition"), the Bank sold approximately 65.2% of the capital of Isracard in a public sale offering on April 8, 2019. After the sale, the Bank retains a holding of approximately 33% of the shares of Isracard. In accordance with the statements in Note 1E to the Condensed Financial Statements, the data of the Isracard Group are not presented in most of the detailed information below.

This Report on Risks is published within the financial reporting of Bank Hapoalim B.M., and contains extensive information regarding the management of risks and capital. This report should be perused in conjunction with the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018; the Annual Financial Statements for 2018; and the Condensed Financial Statements as at June 30, 2019.

Sincerely yours,

Oded Eran	**Ari Pinto**	**Amir Bachar**
Chairman of the Board of Directors	President and Chief Executive Officer	Senior Deputy Managing Director Chief Risk Officer

Tel Aviv, August 14, 2019

A. Introduction

A.1. Forward-looking information

Most of the information in this report that does not refer to historical facts (even if it is based on processing of historical data) constitutes forward-looking information, as defined in the Securities Law, 1968. The actual results of the Bank may differ materially from those included in forward-looking information, including, among other factors, as a result of changes in capital markets in Israel and globally, macro-economic changes, changes in geopolitical conditions, regulatory changes, accounting changes, changes in taxation rules, and other changes not under the Bank's control, which may lead to the failure of estimates to materialize and/or to changes in the Bank's business plans. Forward-looking information is marked by words or phrases such as "forecast," "plan," "objective," "risk estimate," "scenario," "stress scenario," "risk assessment," "correlation," "distribution," "we believe," "expect," "predict," "estimate," "intends," "plans," "aims," "may change," "should," "can," "will," or similar expressions. Such forward-looking expressions involve risk and uncertainty, because they are based on management's estimates regarding future events, which include changes in the following parameters, among others: economic conditions, public tastes, interest rates in Israel and overseas, inflation rates, new legislation and regulation in the area of banking and the capital market, exposure to financial risks, the financial stability of borrowers, the behavior of competitors, aspects related to the Bank's image, technological developments, manpower-related matters, and other areas that affect the activity of the Bank and the environment in which it operates, the materialization of which is uncertain by nature.

This information reflects the Bank's current viewpoint with regard to future events, which is based on estimates, and is therefore subject to risks and uncertainty, as well as to the possibility that expected events or developments may not materialize at all or may only partially materialize, or even that actual developments may be the opposite of expectations.

The information presented below is based, among other things, on information known to the Bank and based, among other things, on publications by various entities, such as the Central Bureau of Statistics, the Ministry of Finance, the Bank of Israel, the Ministry of Housing, and other entities that publish data and estimates regarding the Israeli and global capital markets.

A.2. Disclosure declaration

Pursuant to the instructions of the Bank of Israel, the disclosure declarations in the periodic financial report of the Bank are also valid for the Report on Risks – Pillar 3 Disclosure and Additional Information Regarding Risks. Within the discussions of the condensed financial statements of the Bank, the Board of Directors of the Bank approved the publication of the Report on Risks – Pillar 3 Disclosure and Additional Information Regarding Risks as at June 30, 2019.

B. Principal supervisory ratios, risk-management review, and weighted risk-adjusted assets

B.1. Principal supervisory ratios

Table B-1: Principal supervisory ratios

	On a consolidated basis, as at				
	June 30, 2019	March 31, 2019	December 31, 2018	September 30, 2018	June 30, 2018
	NIS millions				
Available capital					
Common equity Tier 1 capital	**39,852**	38,903	38,004	38,112	37,178
Common equity Tier 1 capital before effect of transitional directives(1)	**39,471**	38,484	37,547	37,617	36,645
Tier 1 capital	**40,585**	39,636	38,981	39,089	38,155
Tier 1 capital before effect of transitional directives(1)	**39,471**	38,484	37,547	37,617	36,645
Total capital	**50,846**	49,072	49,023	49,723	48,771
Total capital before effect of transitional directives(1)	**46,176**	44,158	*43,284	*43,301	*42,297
Risk-weighted assets					
Total risk-weighted assets (RWA)	**332,991**	339,691	340,597	336,678	333,206
Total risk-weighted assets (RWA) before effect of transitional directives(1)	**333,523**	340,277	341,236	337,370	333,951
Capital-adequacy ratios according to the directives of the Banking Supervision Department					
Common equity Tier 1 capital ratio	**11.97%**	11.45%	11.16%	11.32%	11.16%
Common equity Tier 1 capital ratio before effect of transitional directives(1)	**11.83%**	11.31%	11.00%	11.15%	10.97%
Tier 1 capital ratio	**12.19%**	11.67%	11.44%	11.61%	11.45%
Tier 1 capital ratio before effect of transitional directives(1)	**11.83%**	11.31%	11.00%	11.15%	10.97%
Total capital ratio	**15.27%**	14.45%	14.39%	14.77%	14.64%
Total capital ratio before effect of transitional directives(1)	**13.84%**	12.98%	*12.68%	*12.83%	*12.67%
Common equity Tier 1 capital ratio required by the Banking Supervision Department(2)	**10.26%**	10.24%	10.24%	10.24%	10.23%
Available common equity Tier 1 capital ratio beyond the requirement of the Banking Supervision Department(2)	**1.71%**	1.21%	0.92%	1.08%	0.93%
Leverage ratios according to the directives of the Banking Supervision Department					
Total exposures	**511,322**	523,012	518,980	512,146	516,190
Total exposures before effect of transitional directives(1)	**511,535**	523,246	519,236	512,423	516,488
Leverage ratio	**7.94%**	7.58%	7.51%	7.63%	7.39%
Leverage ratio before effect of transitional directives(1)	**7.72%**	7.35%	7.23%	7.34%	7.10%

* Restated.

(1) Before the effect of the transitional directives, including the effect of the adoption of US GAAP on employee benefits, and before the effect of Efficiency Plan Adjustments.

(2) Including a capital requirement at a rate representing 1% of the balance of housing loans at the dates of the financial statements.

Table B-1: Principal supervisory ratios (continued)

	For the three months ended				
	June 30, 2019	March 31, 2019	December 31, 2018	September 30, 2018	June 30, 2018
Liquidity coverage ratio according to the directives of the Banking Supervision Department					
Total high-quality liquid assets	**111,017**	109,781	106,375	109,043	110,310
Total net cash outflows	**87,247**	87,721	88,515	89,726	89,479
Liquidity coverage ratio (in %)	**127%**	125%	120%	122%	123%

B.2. Risk assessment and management

The Bank performs comprehensive examinations to assess the risks to which it is exposed and to estimate the materiality of such risks. Within the ICAAP (the Internal Capital Adequacy Assessment Process), the Bank defined the following risks as material risks: credit risk, concentration risk, market risk, investment risk, operational risk (including IT risk and cyber risk), counterparty risk, interest-rate risk in the banking book, liquidity risk, reputational risk, strategic and competitive risk, regulatory risk, and compliance risk. Other risks to which the Bank is exposed are handled directly as part of the management of its business: legal risk, economic risk, and environmental risk.

Risk management is performed based on a global view of the Bank's activity in Israel and of activity at the Bank's branches abroad, with due attention to the activity of subsidiaries with exposure significant for the Group. The subsidiaries are instructed to manage risks based on the risk strategy and policy of the Group, with adjustments according to the circumstances, which are reported to the parent company. Risks are managed separately by each company in the Bank Group, according to policy formulated by each company's board of directors. The Bank manages the various risks while using hedges for some risks. The Supervisor of Banks has set forth guidelines concerning risk management in the Proper Conduct of Banking Business Directives. The directives detail the requirements of the Supervisor for the management of the various risks to which a banking corporation is exposed, and stipulate fundamental principles for the management and control of risks, including suitable involvement in and thorough understanding of risk management by the board of directors of the banking corporation, the management of risks by a risk manager who is a member of the board of management, the employment of tools for the identification and measurement of risks, and the creation of means for supervision and control, including the existence of an independent risk-control function. The Bank operates in accordance with the guidelines of the Supervisor of Banks.

The Chief Risk Officer (CRO) and the member of the Board of Management responsible for the Risk Management Area is Dr. A. Bachar.

Financial risks are managed by designated members of the Board of Management and under their responsibility.

The principal members of the Board of Management responsible for managing credit risks are the Head of Corporate Banking, Mr. T. Cohen, and the Head of Retail Banking, Mr. R. Stein.

The member of the Board of Management responsible for managing market, investment, and liquidity risks and the Head of Financial Markets and International Banking is Mr. Y. Antebi.

Legal risk is managed by Attorney Y. Almog, Chief Legal Advisor.

Technological risk, including cyber risk, is managed by Ms. E. Ben-Zeev, Head of Information Technology.
Operational risk, excluding legal risk and technological risk, is managed by each member of the Board of Management in the area of activity for which he or she is responsible.
For details regarding changes of members of the Board of Management of the Bank, see the "Other matters" section of the Corporate Governance Report, in the Condensed Financial Statements.
For details and more extensive information regarding risk management governance, including the control approach, the responsible parties, and the committees of the Board of Directors and Board of Management relevant to risk management, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018.

B.3. Severity of risk factors

Pursuant to the directive of the Bank of Israel, the principal risk factors to which the Group is exposed have been mapped. The risk factors and the Board of Management's estimates regarding the severity of the risk of each factor are listed in the following table. The scale for levels of severity of the risk factors is determined with reference to the risk appetite defined by the Bank. This scale consists of five levels of severity for each risk factor. Quantitative metrics have been established for three of the levels (low, medium, and high):

- **Low severity level –** The damage to annual profit due to an extreme event would be smaller than the average annual profit before tax in the ordinary course of business; in other words, an extreme event would not cause the Bank to move to a loss.
- **Medium severity level –** The damage to annual profit due to an extreme event would be larger than the average annual profit before tax in the ordinary course of business, and would therefore cause the Bank to move to a loss in at least one of the years of occurrence of the event, and would cause a decrease in the Tier 1 capital ratio; however, the capital ratio would not fall below the risk capacity that has been established (6.5%).
- **High severity level –** The damage to profit due to an extreme event would cause the Tier 1 capital ratio to fall below the risk capacity of the Bank.

In order to quantify the effect of the risk factors on the Bank's profit and capital ratio, systemic extreme scenarios and single risk factor scenarios were examined for most of the risk factors, and the scenario with the more severe effect was used in the risk-factor table. Note that this quantification refers to the effect on the capital of the Bank. Possible scenarios may involve a decrease in profit, or losses, with a non-negligible effect on the profitability of the Bank; however, the effect of these scenarios on capital adequacy is low, and they are therefore classified at a low level of severity. In addition, when the team of experts estimates that the quantitative indicators do not sufficiently express the severity of the risk factor, or when it is not possible to determine the risk level of a particular risk factor using reliable quantitative methods, the opinion of the team of experts is taken into consideration.
Each risk factor listed in the table below was tested in its own right, under an assumption of independence of each risk factor relative to the other risk factors listed in the table. However, for the risk factors "condition of the global economy" and "condition of the Israeli economy" in the table, systemic scenarios were tested to estimate the effect on profit and on the capital ratio of the combination of a number of risk factors. It is emphasized that the risk scenarios simulate a situation in which unexpected damages materialize beyond the expected level of damage events in the regular course of the Group's business.

The Bank also assesses the level of risk using another method, based on expert evaluations of the inherent risk level, the quality of risk management, the effectiveness of controls, and the residual risk. The inherent risk is the aggregate risk inherent in the activity in which the Bank engages, and is defined as the potential loss from this activity. Inherent risk is evaluated from a forward-looking perspective as well as in view of the past, but without taking management and control processes into consideration. In order to estimate the residual risk, taking into account management and control processes, evaluations by content experts from the second line of defense were added to the model, addressing the quality of risk management and the effectiveness of controls.

The combination of estimates using the two methods to obtain an overall assessment of residual risk, presented in the table below on a scale of five levels of severity, was performed as an expert evaluation, reflecting the input of the experts in the various areas, and is subject to all of the qualifications noted with respect to forward-looking information.

Table B-2: Severity of risk factors

	Risk factor	Risk effect
Financial risks		
1.	Credit risk (including counterparty risk)	Medium
1.1.	Of which: risk in respect of the quality of borrowers and/or collateral	Medium
1.2.	Of which: risk in respect of sector concentration	Medium
1.3.	Of which: risk in respect of concentration of borrowers/borrower groups	Medium
2.	Market risk	Low-Medium
2.1.	Of which: interest-rate risk	Low-Medium
2.2.	Of which: inflation risk/exchange-rate risk	Low
2.3.	Of which: share price and credit spread risk	Low-Medium
3.	Liquidity risk	Low-Medium
Operational and legal risks		
4.	Operational risk(1)	Medium
4.1.	Of which: cyber risk	Medium
4.2.	Of which: IT risk	Medium
5.	Legal risk	Low
Other risks		
6.	Reputational risk	Low-Medium
7.	Strategic and competitive risk	Medium
8.	Regulatory and legislative risk	Medium
9.	Economic risk – condition of the Israeli economy	Medium
10.	Economic risk – condition of the global economy	Medium
11.	Compliance risk*(2)	Medium-High

* Compliance risk also includes risks arising from the investigations by United States authorities, as noted in Notes 10D and 10E to the Condensed Financial Statements.

(1) The level of operational risk and the level of IT risk included therein have been raised to Medium, taking into consideration the complex operational environment, in view of technological aspects as well as other non-technological aspects.

(2) The level of compliance risk has been raised to Medium-High, taking into consideration the increasing strength of regulation and of the enforcement environment, in Israel and worldwide.

B.4. Top and emerging risks

Based on the recommendations of the FSB (Financial Stability Board), a top risk is defined as a development currently occurring in the business environment of the Bank that may adversely affect the Bank's results over the course of the coming year. By contrast, with respect to an emerging risk, there is greater uncertainty regarding the timing of materialization of the risk as an occurrence with a material effect on the strategy of the Bank.

The management of risks at the Bank Group is described extensively in the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018.

The Board of Management and Board of Directors of the Bank discussed the effect of the top and emerging risks described below on the Bank; from time to time, they examine the need to adjust business strategy to such developments.

- **Compliance risk:** Pursuant to Proper Conduct of Banking Business Directive 308, compliance risk also includes risks related to the fairness of the Bank towards its customers, conflicts of interest, the prohibition of money laundering and financing of terrorism, provision of advice to customers, protection of privacy (excluding information-technology aspects), taxation aspects relevant to products or services for customers, or directives of a similar nature. The materialization of this risk globally is reflected in the continuing investigations of banks around the world, and the fines imposed on them in connection with the violation of laws or regulations, such as in the areas of assisting tax evasion, the prevention of terrorism financing, money laundering, and investigations of corruption. The Bank Group's business with American customers and the issue of FIFA are under investigation by the authorities in the United States. The Bank estimates that the aggregate total to be paid by the Bank Group in connection with the investigation of the Bank Group's business with American customers is likely to be significantly higher than the amount of the existing provision in the financial statements. Very significant fines may adversely affect the results of the Bank. At this time, it appears that a resolution or resolutions with the United States Department of Justice regarding this matter may be in the form of a deferred prosecution agreement or a plea agreement. The type of resolution, if attained, may also affect the Bank, in that a severe resolution may cause damage to the Bank's business. For details regarding the investigations of the United States authorities, see Note 10D and 10E to the Condensed Financial Statements as at June 30, 2019.
- **Macro-economic environment:** The activity of the Bank is dependent on the business environment, in Israel and globally. The condition of the global economy; significant changes in monetary policies and interest-rate curves; market volatility; changes in prices of financial assets in Israel and worldwide, and in real-estate prices; and the economic, political, and security situation in Israel and in the region have the potential to affect the activity of the Bank. The Bank's multi-annual strategic plan includes certain assumptions regarding the macro-economic environment, taking into consideration the existing risks in the global and Israeli economy, and balances risk and return considerations.

- **Regulatory environment in Israel and overseas:** International regulatory reforms have implications for the business of the Bank, in Israel and globally. In Israel, several regulatory initiatives have been formulated over the last few years, with the primary aim of increasing competition in the banking system in Israel; several additional regulatory initiatives are in the process of being generated. The regulatory initiatives and trends, and specifically the mandatory separation of the Bank from its credit-card companies and the significant changes in this area of activity, as well as the mobility of bank accounts and open API, may affect the banking system in general and the Bank in particular. At this stage, it is too early to estimate and assess the effect thereof on the Bank. For details regarding the Law for Increasing Competition and Reducing Concentration in the Banking Market in Israel, 2017, see Note 16 to the Condensed Financial Statements as at June 30, 2019.
- **Information security and cyber incident risk:** Increasing cyber threats to financial institutions have led to the channeling of resources in the banking industry to cope with this risk. The Bank applies frequent controls in all channels in order to prevent harmful penetration, activation of malicious software, and information leakage. The lines of defense consist of a large number of advanced information-security systems, deployed internally in the Bank's network as well as externally as a perimeter defense.
- **Competitive and strategic risk:** New competition from big tech companies (Apple, Google, Facebook, Amazon, and others) and fintech companies, alongside the entry of new technologies, changes in customer behavior, and new business models in the financial sphere, may significantly affect the banking system, in Israel and worldwide, in the medium to long term. Concurrently, regulatory and competitive changes in the domestic arena, with an emphasis on measures aimed at increasing competition in the retail credit market, such as the Credit Data Law, which took effect on April 12, 2019, may affect the business results of the Bank. The Bank has formulated a strategic plan for 2019-2021, encompassing action in the areas of innovation, technology, the structure of its operations, and more, in order to respond to all such threats.

For details regarding legal proceedings, see Note 10 to the Condensed Financial Statements as at June 30, 2019.
For details regarding material regulatory initiatives with an effect on the activity of the Bank during the reported period, see Note 16 to the Condensed Financial Statements as at June 30, 2019.

B.5. Review of weighted risk-adjusted assets

Table B-3: Review of weighted risk-adjusted assets

		Risk-weighted assets		Minimum capital requirements*
		June 30, 2019	March 31, 2019	**June 30, 2019**
		NIS millions		
1	Credit risk (standardized approach)**	**285,760**	293,179	**39,321**
6	Counterparty credit risk (standardized approach)	**5,070**	5,585	**698**
10	Credit valuation adjustment (CVA)	**2,629**	3,047	**362**
15	Settlement risk	**-**	-	**-**
16	Securitization exposures (standardized approach)	**127**	133	**17**
25	Amounts below deduction thresholds (subject to 250% risk weight)	**11,795**	10,464	**1,622**
	Total credit risk	**305,381**	312,408	**42,020**
20	Market risk (standardized approach)	**3,578**	2,998	**492**
24	Operational risk	**24,032**	24,285	**3,307**
27	Total	**332,991**	339,691	**45,819**

* Capital requirements according to the minimum required total capital ratio, plus a capital requirement reflecting 1% of the balance of housing loans at the reporting date, at a rate of 13.76%.

** Credit risk does not include counterparty credit risk, adjustment in respect of credit risk, settlement risk, securitization exposures, and amounts below the deduction thresholds.

C. Capital and leverage

C.1. Composition of capital

Table C-1: Composition of supervisory capital

		June 30, 2019	June 30, 2018	December 31, 2018
		NIS millions		
	Common equity Tier 1 capital			
	Common equity Tier 1 capital – instruments and retained earnings			
1	Ordinary share capital issued by the banking corporation and premium on ordinary shares included in common equity Tier 1 capital	**8,167**	8,135	8,135
2	Retained earnings, including dividends proposed or declared after the balance sheet date	**32,239**	29,518	30,565
3	Accumulated other comprehensive income and disclosed retained earnings	**(903)**	(999)	(1,156)
5	Ordinary shares issued by subsidiaries of the banking corporation which were consolidated and are held by a third party (non-controlling interests)	**17**	43	40
6	Common equity Tier 1 capital before supervisory adjustments and deductions	**39,520**	36,697	37,584
	Common equity Tier 1 capital – supervisory adjustments and deductions			
9	Other intangible assets, excluding mortgage service rights, net of deferred taxes payable	**8**	-	-
10	Deferred tax assets, realization of which depends on future profitability of the banking corporation, excluding deferred tax assets arising from timing differences	**40**	35	34
11	Total accumulated other comprehensive income in respect of cash-flow hedges of items not presented in the balance sheet at fair value	**(1)**	(1)	(1)
14	Unrealized profits and losses resulting from changes in the fair value of liabilities due to changes in the own credit risk of the banking corporation	**2**	5	4
16	Investment in own ordinary shares held directly or indirectly (including commitments to purchase shares under contractual agreements)	**-**	13	-
21	Deferred tax assets arising from timing differences in amounts exceeding 10% of common equity Tier 1 capital	**-**	-	-
26	Additional supervisory adjustments and deductions established by the Banking Supervision Department	**(381)**	(533)	(457)
26C	Of which: additional supervisory adjustments to common equity Tier 1 capital	**(381)**	(533)	(457)
26C	Of which: in respect of the efficiency plan	**(381)**	(533)	(457)
26C	Of which: in respect of wage tax	**-**	-	-
28	Total supervisory adjustments and deductions in common equity Tier 1 capital	**(332)**	(481)	(420)
29	Common equity Tier 1 capital	**39,852**	37,178	38,004

Table C-1: Composition of supervisory capital (continued)

		June 30, 2019	June 30, 2018	December 31, 2018
		NIS millions		
	Additional Tier 1 capital			
	Additional Tier 1 capital – instruments			
33	Additional Tier 1 capital instruments issued by the corporation, which are eligible for inclusion in supervisory capital during the transitional period	**733**	977	977
36	Additional Tier 1 capital before deductions	**733**	977	977
	Additional Tier 1 capital – deductions			
43	Total deductions from additional Tier 1 capital	**-**	-	-
44	Additional Tier 1 capital	**733**	977	977
45	Tier 1 capital	**40,585**	38,155	38,981
	Tier 2 capital			
	Tier 2 capital – instruments and provisions			
47	Tier 2 capital instruments issued by the corporation, which are eligible for inclusion in supervisory capital during the transitional period	**42**	104	57
48	Tier 2 capital instruments issued by subsidiaries of the banking corporation to third-party investors	**6,434**	6,687	6,074
49	Of which: Tier 2 capital instruments issued by subsidiaries of the banking corporation and held by third-party investors, which are gradually deducted from Tier 2 capital	**3,514**	4,869	4,251
50	Collective allowances for credit losses before the effect of related tax	**3,785**	3,825	3,911
51	Tier 2 capital before deductions	**10,261**	10,616	10,042
	Tier 2 capital – deductions			
57	Total supervisory adjustments to Tier 2 capital	**-**	-	-
58	Tier 2 capital	**10,261**	10,616	10,042
59	Total capital	**50,846**	48,771	49,023
	Risk-weighted assets			
	Total risk-weighted assets according to the requirements prior to the adoption of Directive 202, in accordance with Basel 3	**332,618**	332,620	339,973
	Of which: credit risk assets	**305,008**	305,390	312,276
	Of which: market risk assets	**3,578**	3,212	3,429
	Of which: operational risk assets	**24,032**	24,018	24,268
60	Total risk-weighted assets	**332,991**	333,206	340,597

Table C-1: Composition of supervisory capital (continued)

		June 30, 2019	June 30, 2018	December 31, 2018
		NIS millions/percent		
	Capital ratios and capital preservation cushions			
61	Common equity Tier 1 capital	**11.97%**	11.16%	11.16%
62	Tier 1 capital	**12.19%**	11.45%	11.44%
63	Total capital	**15.27%**	14.64%	14.39%
	Minimum requirements established by the Banking Supervision Department			
69	The required minimum common equity Tier 1 capital ratio is 10%. A capital requirement at a rate representing 1% of the balance of housing loans at the dates of the financial statements was added to this ratio.	**10.26%**	10.23%	10.24%
71	The required minimum total capital ratio is 13.5%. A capital requirement at a rate representing 1% of the balance of housing loans at the dates of the financial statements was added to this ratio.	**13.76%**	13.73%	13.74%
	Amounts below the deduction threshold (before risk weighting)			
72	Investments in the capital of financial corporations which do not exceed 10% of the ordinary share capital issued by the financial corporation and which are below the deduction threshold	**1,441**	1,968	1,802
73	Investments in the capital of financial corporations which exceed 10% of the ordinary share capital issued by the financial corporation and which are below the deduction threshold	**1,343**	862	656
75	Deferred tax assets arising from timing differences, below the deduction threshold	**3,588**	3,504	3,645
	Ceiling for inclusion of provisions in Tier 2			
76	Provision qualifying for inclusion in Tier 2, with reference to exposures under the standardized approach, before application of the ceiling	**3,785**	3,905	3,919
77	Ceiling for inclusion of provision in Tier 2 under the standardized approach	**3,817**	3,825	3,911
	Capital instruments not qualifying as supervisory capital, which are subject to the transitional directives			
82	Present ceiling amount for instruments included in additional Tier 1 capital subject to the transitional directives	**733**	977	977
83	Amount deducted from additional Tier 1 capital due to the ceiling	**822**	1,454	887
84	Present ceiling amount for instruments included in Tier 2 capital subject to the transitional directives	**4,577**	6,102	6,102
85	Amount deducted from Tier 2 capital due to the ceiling	**-**	-	-

C.2. Capital adequacy

C.2.a. Capital-adequacy target

Pursuant to the circular of the Banking Supervision Department concerning minimum capital ratios, the Bank, as a banking corporation of significant importance (a banking corporation whose total balance sheet assets on a consolidated basis constitute at least 20% of the total balance sheet assets of the banking system in Israel), is required to maintain a minimum common equity Tier 1 capital ratio of 10% and a minimum total capital ratio of 13.5%. A capital requirement at a rate representing 1% of the balance of housing loans at the dates of the financial statements was added to the minimum capital ratios.

Accordingly, the minimum common equity Tier 1 capital ratio and the minimum total capital ratio of the Bank required by the Banking Supervision Department, on a consolidated basis, based on data as at June 30, 2019, stand at 10.26% and 13.76%, respectively.

Pursuant to a resolution of the Board of Directors of the Bank, the target common equity Tier 1 capital ratio is 10.75% as of December 31, 2017.

C.2.b. Planning and management of capital by the Bank

Issuance of subordinated notes with a loss-absorption mechanism

During the second quarter of 2019, the Bank issued a series of subordinated notes, in the amount of approximately NIS 1 billion, which constitute part of the Tier 2 capital of the Bank. For details regarding the issue, see Note 9J to the Condensed Financial Statements as at June 30, 2019.

Early redemption of capital notes in Tier 1 capital

The Bank carried out full early redemption of the subordinated notes in Series B in February 2019, in the amount of NIS 582 million.

In June 2019, the Banking Supervision Department approved the Bank's request for early redemption of the subordinated notes in Series D, the balance of which as at June 30, 2019, is NIS 349 million. The redemption will be carried out in September 2019.

Dividends

Before the date of approval of the financial statements as at June 30, 2018, the Banking Supervision Department notified the Bank that in light of the substantive uncertainty with respect to the investigation of the United States authorities, and for reasons of caution and conservatism, the Banking Supervision Department was of the opinion that, at that time, quarterly dividends from earnings should not be distributed by the Bank. Accordingly, for reasons of conservatism and in coordination with the Bank of Israel, beginning in the second quarter of 2018, the Board of Directors of the Bank has not declared the distribution of quarterly dividends from earnings, with no change to the Bank's dividend distribution policy. See also Note 24 to the Annual Financial Statements for 2018.

As a result of the sale of approximately 65% of the shares of Isracard in the second quarter of 2019 (see Note 17 to the Condensed Financial Statements), the Bank accumulated additional capital surplus in the amount of approximately NIS 1.3 billion (of which approximately NIS 0.3 billion in respect of a decrease in the operational risk of Isracard, which will be recognized gradually, over a period of three years). In coordination with the Banking Supervision Department, and according to the instructions of the Board of Directors of the Bank, the Board of Management has started to formulate a plan for a buyback of shares of the Bank against this capital surplus, to be executed over a period of time; concurrently, the possibility of dividend distribution from part of the capital surplus is also being examined, all subject to the directives of the law and of the Banking Supervision Department on this matter, and taking into consideration the circumstances of the Bank. Any buyback plan or dividend distribution in connection with the aforesaid capital surplus or part thereof, if and as resolved upon, and the scope thereof, are subject to resolution and approval by the Board of Directors of the Bank.

For further details regarding the directives of the Bank of Israel concerning buyback plans of banking corporations, see Note 9L to the Condensed Financial Statements as at June 30, 2019.

C.2.c. Implementation of regulatory directives with an effect on measurement and capital-adequacy matters

Sale of Isracard

In accordance with the requirements of the Law for Increasing Competition and Reducing Concentration in the Banking Market in Israel (Legislative Amendments), 2017 (the "Law for Increasing Competition"), and the publication of the prospectus for a public sale offering of the shares of Isracard, the Bank sold approximately 65.2% of the capital of Isracard in a public sale offering on April 8, 2019. The sale led to an increase of approximately 0.3% in the common equity Tier 1 capital ratio and in the total capital ratio. For details regarding the holdings of the Bank in the Isracard Group, see Section 2.6.1, "Principal companies," in the Report of the Board of Directors and Board of Management as at June 30, 2019.

Improving operational efficiency

In January 2016, the Banking Supervision Department issued a letter on the subject, "Improving the operational efficiency of the banking system in Israel" (the "Efficiency Directive"). Pursuant to the Efficiency Directive, the boards of directors of banking corporations shall formulate a multi-year plan to improve efficiency. Banking corporations that meet the conditions established in the directive will be granted a relief allowing them to spread the effects of the plan over a period of up to five years in a straight line, for the purposes of the calculation of capital-adequacy ratios and of the leverage ratio. In October 2016, the Board of Directors of the Bank approved an efficiency plan at an estimated cost in the amount of NIS 762 million, net of tax effect, which was allocated to capital. The effect of the costs of the efficiency plan on the ratio of common equity Tier 1 capital to risk components, estimated at approximately 0.14% as at June 30, 2019, are being allocated in equal parts over five years, beginning in 2017.

Further to the Efficiency Directive, in June 2017, the Banking Supervision Department issued a letter entitled, "Improving the operational efficiency of the banking system in Israel – efficiency in the area of real estate," which encourages banking corporations to also examine, in addition to improved efficiency in personnel expenses, the possibility of reducing real-estate and maintenance costs of headquarters and management units, including through a reexamination of the geographical location of such units (hereinafter: "Real-Estate Efficiency").

In order to encourage the implementation of a plan for Real-Estate Efficiency, the Banking Supervision Department will approve reliefs for the banks in the area of capital adequacy.
The Banking Supervision Department has extended the period for implementation of the efficiency plan until December 31, 2019.

The subsidiary of the Bank in Turkey

In January 2019, a letter was received from the Bank of Israel concerning the subsidiary of the Bank in Turkey, Bank Pozitif. In the letter, the Bank of Israel stated that the activity of the Bank in Turkey exposes it to significant risks, and therefore, until the realization of the full holdings of the Bank in Bank Pozitif, the Bank is required to increase the risk weighting rates of risk-adjusted assets in respect of this activity, in the calculation of the consolidated capital ratio only, as follows:

- Beginning January 1, 2020, risk-adjusted assets in respect of the activity of Bank Pozitif will be weighted at a rate of at least 300%.
- Beginning January 1, 2021, the risk-adjusted assets will be weighted at a rate of at least 600%.

The effect of this instruction on the common equity Tier 1 capital ratio, based on data as at June 30, 2019, is a decrease of approximately 0.05%, under the assumption of weighting of the risk-adjusted assets at 300%, and a decrease of approximately 0.12%, under the assumption of weighting of the risk-adjusted assets at 600%.
The Bank is examining possibilities for the sale of its full holdings in Bank Pozitif, and in accordance with its strategic plan, has decided to gradually reduce the credit portfolio.

C.2.d. Basel 3 directives

The Basel 3 directives took effect on January 1, 2014. Implementation is gradual, in accordance with the transitional directives established in Proper Conduct of Banking Business Directive 299, “Capital Measurement and Adequacy – Supervisory Capital – Transitional Directives.” In accordance with the transitional directives, capital instruments that no longer qualify as supervisory capital were recognized as of January 1, 2014, up to a ceiling of 80% of their balance in the supervisory capital as at December 31, 2013; this ceiling is being lowered by an additional 10% in each subsequent year, until January 1, 2022. Accordingly, the ceiling for instruments qualifying as supervisory capital was 40% in 2018, and stands at 30% in 2019.

C.3. Leverage ratio

The Bank applies Proper Conduct of Banking Business Directive 218, "Leverage Ratio" (hereinafter: the "Directive"). The Directive establishes a simple, transparent, non-risk-based leverage ratio, which serves as a complementary measurement to risk-based capital requirements, and which is designed to limit the accumulation of leverage at banking corporations.

The leverage ratio is expressed as a percentage, and is defined as the ratio of the capital measurement to the exposure measurement. Capital, for the purpose of measurement of the leverage ratio, is Tier 1 capital, as defined in Proper Conduct of Banking Business Directive 202, taking into consideration the transitional arrangements that have been established. The total exposure measurement is the total of balance sheet exposures, exposures to derivatives and to securities financing transactions, and off-balance sheet items.

Table C-2: Comparison of balance sheet assets to exposure measurement, for the purposes of the leverage ratio

	June 30, 2019	June 30, 2018	December 31, 2018
		NIS millions	
Total consolidated assets as per published financial statements	**454,247**	451,366	460,926
Adjustment for investments in banking, financial, insurance, or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	**-**	-	-
Adjustment for fiduciary assets recognized in the balance sheet pursuant to the Public Reporting Directives, but excluded from the leverage ratio exposure measurement	**-**	-	-
Adjustments for derivative financial instruments	**(809)**	282	333
Adjustments for securities financing transactions	**-**	-	-
Adjustments for off-balance sheet items	**54,838**	61,525	54,608
Other adjustments	**3,046**	3,017	3,113
Exposure for the purposes of the leverage ratio	**511,322**	516,190	518,980

Table C-3: Leverage ratio disclosure

	June 30, 2019	June 30, 2018	December 31, 2018
	NIS millions/percent		
On-balance sheet exposures			
On-balance sheet items (excluding derivatives and securities financing transactions, but including collateral)	**447,440**	443,058	452,831
Asset amounts deducted in determining Tier 1 capital	**(48)**	(35)	(34)
Total on-balance sheet exposures (excluding derivatives and securities financing transactions)	**447,392**	443,023	452,797
Derivative exposures			
Replacement cost associated with all derivatives transactions	**4,786**	5,700	5,717
Add-on amounts for potential future exposure associated with all derivatives transactions	**5,576**	6,338	6,704
Gross-up for collateral provided in respect of derivatives deducted from balance sheet assets pursuant to the Public Reporting Directives	**-**	-	-
Deductions of receivables assets for cash variation margin provided in derivatives transactions	**(1,596)**	(1,152)	(1,554)
Exempted central counterparty leg of client-cleared trade exposures	**-**	-	-
Adjusted effective notional amount of written credit derivatives	**-**	128	-
Adjusted effective notional offsets and add-on deductions for written credit derivatives	**-**	-	-
Total derivative exposures	**8,766**	11,014	10,867
Securities financing transaction exposures			
Gross securities financing transaction assets (with no recognition of netting), after adjusting for sale accounting transactions	**326**	628	708
Netted amounts of cash payables and cash receivables of gross securities financing transaction assets	**-**	-	-
Central counterparty credit risk exposure for securities financing transaction assets	**-**	-	-
Agent transaction exposures	**-**	-	-
Total securities financing transaction exposures	**326**	628	708
Other off-balance sheet exposures			
Off-balance sheet exposure at gross notional amount	**168,670**	185,108	185,688
Adjustments for conversion to credit equivalent amounts	**(113,832)**	(123,583)	(131,080)
Off-balance sheet items	**54,838**	61,525	54,608
Capital and total exposures			
Tier 1 capital*	**40,585**	38,155	38,981
Total exposures*	**511,322**	516,190	518,980
Leverage ratio			
Leverage ratio pursuant to Proper Conduct of Banking Business Directive 218	**7.94%**	7.39%	7.51%
Minimum leverage ratio required by the Banking Supervision Department	**6.00%**	6.00%	6.00%

* These data also include Efficiency Plan Adjustments, established based on the letter of the Banking Supervision Department of January 12, 2016, "Improvement of the operational efficiency of the banking system in Israel." The effect of the costs of the efficiency plan on the leverage ratio as at June 30, 2019, estimated at approximately 0.08%, is allocated in equal parts over five years, beginning in 2017.

D. Credit risk

Credit risk is the risk that a borrower or debtor may default on obligations to the Bank under a credit agreement.

The credit portfolio is a major component of the asset portfolio of the Bank Group; therefore, deterioration in the stability of the various borrowers may have an adverse effect on the Group's asset value and profitability.

Activities that create credit risk include:

- **Balance sheet exposures –** Present liabilities to the Bank, such as credit and mortgages to the public, credit to banks and deposits with banks, credit to governments, investment in bonds (corporate and other), and the balance sheet part (market value) of derivatives and financial instruments.
- **Off-balance sheet exposures –** Potential (unrealized) liabilities to the Bank, such as guarantees, unutilized commitments to grant credit, unutilized credit facilities, and potential liabilities arising from changes in the value of transactions in derivative financial instruments. The credit risk arising from transactions in derivative financial instruments is counterparty risk – the risk that the counterparty to the transaction will default before the final settlement of cash flows in the derivatives transaction. Counterparty risk is addressed separately in Section E, below.

Another risk arising from the portfolio of credit exposures is concentration risk. Concentration risk arises from non-optimal diversification of specific risks in the credit portfolio, such that the credit portfolio is insufficiently diversified across the various risk factors; for example, when the credit portfolio is composed of a small number of borrowers (name concentration) or has a high degree of exposure to a particular economic sector (sector concentration).

In accordance with the reporting directives of the Bank of Israel, this section contains items to which the Basel credit-risk framework applies, pursuant to Proper Conduct of Banking Business Directive 203, unless explicitly noted otherwise.

D.1. Credit quality of credit exposures

Table D-1: Credit risk indicators

	As at	
	June 30, 2019	December 31, 2018
Balance of impaired credit to the public, as a percentage of the balance of credit to the public*	**0.99%**	0.95%
Balance of unimpaired credit to the public, in arrears of 90 days or more, as a percentage of the balance of credit to the public*	**0.31%**	0.28%
Allowance for credit losses in respect of credit to the public, as a percentage of the balance of credit to the public*	**1.37%**	1.31%
Collective allowance for credit losses, as a percentage of the balance of credit to the public*	**1.14%**	1.14%
Allowance for credit losses in respect of credit to the public, as a percentage of the balance of impaired credit to the public*	**137.87%**	138.11%
Allowance for credit losses in respect of credit to the public, as a percentage of the balance of impaired credit to the public plus the balance of credit to the public in arrears of 90 days or more*	**105.22%**	106.49%
Problematic credit risk in respect of the public, as a percentage of total credit risk in respect of the public*	**2.01%**	1.89%
Provision (income) for credit losses as a percentage of the average recorded balance of credit to the public	(1)**0.30%**	0.22%
Net charge-offs in respect of credit to the public as a percentage of the average recorded balance of credit to the public	(1)**0.15%**	0.20%
Net charge-offs in respect of credit to the public as a percentage of the allowance for credit losses in respect of credit to the public	(1)**10.87%**	14.58%

* Before deduction of the allowance for credit losses.
(1) Calculated on an annualized basis.

The NPL rate is presented in Table 32 in the Report of the Board of Directors and Board of Management as at June 30, 2019.

Portfolio quality analysis

The following indicators increased (worsened) in the first half of 2019:

- The balance of impaired credit to the public, as a percentage of the balance of credit to the public.
- The NPL rate.
- The balance of unimpaired credit to the public, in arrears of 90 days or more, as a percentage of the balance of credit to the public.
- The allowance for credit losses in respect of credit to the public, as a percentage of the balance of credit to the public.
- Problematic credit risk in respect of the public, as a percentage of total credit risk in respect of the public.
- The provision (income) for credit losses as a percentage of the average recorded balance of credit to the public.

The indicator of the collective allowance for credit losses, as a percentage of the balance of credit to the public, was stable; net charge-offs in respect of credit to the public, as a percentage of the average recorded balance of credit to the public, improved.

The measures applied by the Bank to improve the quality of underwriting in the portfolio of credit to private individuals have continued to exert an impact in the form of a decrease in net charge-offs in respect of credit to the public as a percentage of the average recorded balance of credit to the public. In the indicators that worsened in the first half, rates were mostly lower than in the past.

With regard to other indicators that refer to only to the risk in the portfolio of credit for private individuals, see Table D-7, below.

Table D-2: Credit quality of credit exposures

		June 30, 2019			
		Gross balances		Allowances for credit losses or impairment	Net balances
		Impaired or in arrears of 90 days or more	Others		
		NIS millions			
1	Debts, excluding bonds	**3,547**	**374,253**	**705**	**377,095**
2	Bonds	**-**	**61,787**	**-**	**61,787**
3	Off-balance sheet exposures	**-**	**168,732**	**62**	**168,670**
4	Total	**3,547**	**604,772**	**767**	**607,552**

		June 30, 2018			
		Gross balances		Allowances for credit losses or impairment	Net balances
		Impaired or in arrears of 90 days or more	Others		
		NIS millions			
1	Debts, excluding bonds	3,518	382,317	544	385,291
2	Bonds	-	48,830	-	48,830
3	Off-balance sheet exposures	-	185,209	101	185,108
4	Total	3,518	616,356	645	619,229

		December 31, 2018			
		Gross balances		Allowances for credit losses or impairment	Net balances
		Impaired or in arrears of 90 days or more	Others		
		NIS millions			
1	Debts, excluding bonds	3,934	394,373	594	397,713
2	Bonds	-	47,860	-	47,860
3	Off-balance sheet exposures	-	185,769	81	185,688
4	Total	3,934	628,002	675	631,261

For details regarding changes in the inventory of impaired debts, see Table 3-3 in the section "Review of risks" in the Report of the Board of Directors and Board of Management as at June 30, 2019.

D.2. Credit risk in respect of exposures to borrowers and to groups of borrowers

Table D-3: Details of balances of balance sheet credit and off-balance sheet credit risk to borrowers whose indebtedness exceeds NIS 1,200 million, by sector of the economy

	June 30, 2019			
	Number of borrowers	Balance sheet credit risk	Off-balance sheet credit risk	Total
		NIS millions		
Economic sector				
Industry	**3**	**724**	**4,660**	**5,384**
Construction and real estate – construction	**-**	**-**	**-**	**-**
Construction and real estate – real-estate activities	**-**	**-**	**-**	**-**
Electricity and water supply	**1**	**1,319**	**1,473**	**2,792**
Financial services*	**6**	**9,699**	**7,863**	**17,562**
Total	**10**	**11,742**	**13,996**	**25,738**

	December 31, 2018			
	Number of borrowers	Balance sheet credit risk	Off-balance sheet credit risk	Total
		NIS millions		
Economic sector				
Industry	3	877	5,164	6,041
Construction and real estate – construction	-	-	-	-
Construction and real estate – real-estate activities	1	756	647	1,403
Electricity and water supply	1	1,276	2,315	3,591
Financial services	3	3,077	2,571	5,648
Total	8	5,986	10,697	16,683

* Due to the discontinuation of consolidation of Isracard, balance sheet credit balances in the amount of NIS 3,481 million and off-balance sheet credit balances in the amount of NIS 4,030 million were included for the first time.

Credit risk in respect of exposure to borrower groups

The Bank conducts monitoring and control processes in order to examine compliance with the limits set forth in Directive 313 with regard to exposure to the indebtedness of borrower groups. As at the reporting date, the Bank is in compliance with the limits.

Table D-4: Credit risk balances[1] for each group of borrowers whose net indebtedness on a consolidated basis exceeds 15% of the capital of the banking corporation (as defined in Directive 313) as at June 30, 2019

	Balance sheet credit risk	Off-balance sheet credit risk	Of which: off-balance sheet credit risk in respect of derivative instruments[2]	Gross indebtedness[3]	Deductions[4]	Net indebtedness[1]	Percentage of regulatory capital
	NIS millions						
Borrower group A	**3,619**	**3,283**	**410**	**6,912**	**20**	**6,891**	**17.39%**

(1) The data presented below represent exposure to borrower groups, and are stated after the permitted deductions pursuant to Directive 313. These data are therefore not comparable with data regarding borrowers' indebtedness provided in other disclosures in the report.
(2) Off-balance sheet credit risk in respect of derivative instruments, as calculated for the purposes of the limits on indebtedness of borrowers and of borrower groups.
(3) This amount includes third-party guarantees outside the group.
(4) Deductions permitted under Directive 313, mainly including deposits deposited at the Bank, bonds issued by the State of Israel, and deductible indemnity letters of the State of Israel or financial institutions.

D.3. Risks in the housing loan portfolio

Table D-5: Development of the balance in the housing credit portfolio, by linkage base and as a percentage of the balance in the credit portfolio of the Bank

	Unlinked segment				CPI-linked segment				Foreign-currency segment		Total	
	Fixed interest rate		Floating interest rate		Fixed interest rate		Floating interest rate		Floating interest rate			
	Balance in NIS millions	Rate in %	Balance in NIS millions	Rate in %	Balance in NIS millions	Rate in %	Balance in NIS millions	Rate in %	Balance in NIS millions	Rate in %	Recorded debt balance in NIS millions	Rate of change during the period
June 30, 2019	**15,643**	**18.2%**	**32,793**	**38.2%**	**13,888**	**16.2%**	**23,132**	**27.0%**	**315**	**0.4%**	**85,771**	**5.3%**
Dec. 31, 2018	14,503	17.8%	31,060	38.1%	13,539	16.6%	21,984	27.0%	368	0.5%	81,454	9.3%
Dec. 31, 2017	12,455	16.7%	28,022	37.6%	12,988	17.4%	20,619	27.7%	437	0.6%	74,521	7.6%

Risk quantification and measurement – housing credit portfolio

The Bank routinely monitors developments in the housing credit portfolio, and applies various measures to manage risk. Housing credit risks are examined individually, based on the policies and objectives established in the risk appetite set for housing credit, from the level of the individual transaction to an overview of the housing credit portfolio of the Bank.

Risk hedging: The Bank manages and hedges risk, among other means, through limits on various segments, as established in policy discussions of the Board of Management and the Board of Directors, overseen and led by the Risk Management Area. The limits address LTV rates, repayment capability, distribution of credit products in the portfolio, volume of problematic debt, loan durations, geographical distribution, rate of arrears, etc. These indicators are also monitored in comparison to the data of the banking system as a whole.

The Bank tracks conditions and changes in macro-economic indicators in general, and in the business environment of the industry in particular. Certain events require a reexamination of policy, such as a sharp increase in the floating interest rate or in inflation, an increase in unemployment in the Israeli economy, or a material change in housing prices.

Data are reported on a monthly basis in an Area-level risk forum headed by the Head of Retail Banking, and on a quarterly basis as part of the report on developments in the credit portfolio and in credit risk to the Board of Management and Board of Directors.

The Bank uses a statistical model to measure the probability of default and the expected loss in the mortgage portfolio. In addition, stress scenarios are applied to the mortgage portfolio, and the effect on the portfolio and on the Bank as a whole is analyzed. These scenarios include a sharp decline in prices of homes, an increase in the interest rate, and an increase in the unemployment rate. In addition, insurance arrangements are in place (life insurance and building insurance).

Table D-6: Details of characteristics of housing credit granted by the Bank – percentage of total new loans executed

	For the three months ended				
	June 30, 2019	March 31, 2019	December 31, 2018	September 30, 2018	June 30, 2018
Characteristics					
Financing rate over 60%	**37.9%**	38.1%	34.5%	34.2%	31.2%
Ratio of repayment to income greater than 40% (for purchases of homes and in monthly payments)	**0.0%**	0.0%	0.2%	0.1%	0.1%
Percentage with floating interest rates varying at a frequency of less than 5 years	**31.7%**	31.5%	30.3%	32.5%	32.6%
Percentage with floating rates	**59.2%**	59.2%	57.9%	59.5%	60.1%
Percentage of all-purpose loans	**5.7%**	6.0%	6.3%	6.2%	5.7%
Loans for investment purposes as a percentage of total purchases of homes	**10.0%**	9.7%	10.2%	9.0%	9.3%
Principal planned for repayment after age 67 (excluding investments)	**7.4%**	6.9%	7.3%	7.3%	7.0%
Average original term to maturity of loans for purchases of homes, in years (excluding bridge loans)	**24.5**	24.7	24.6	24.6	24.5

Balances rose significantly in the second quarter of 2019. Data on loan execution show improvement on two indicators:

- A moderate decrease in the percentage of credit granted with a financing rate greater than 60%.
- A decrease in the percentage of all-purpose loans.

In addition, the average term to maturity of loans for purchases of homes (excluding bridge loans) decreased, following a long trend of increase in terms.

The percentage of floating-rate loans remained similar to the preceding quarter. The percentage of credit granted with repayment to income greater than 40% remained at a near-zero level, similar to the preceding quarter.

The percentage of credit granted with principal planned for repayment after the age of 67 (excluding investments) and loans for investment purposes as a percentage of total purchases of homes increased.

Overall, housing credit indicators demonstrate that balances grew while underwriting quality was maintained.

D.4. Credit to private individuals (excluding housing)

Table D-7: Balance of credit to private individuals in Israel*

	Balance as at		Change	
	June 30, 2019	December 31, 2018		
	NIS millions			%
Balance sheet				
Negative balance in current accounts	**3,312**	3,892	(580)	(14.90%)
Loans[1]	**28,443**	29,791	(1,348)	(4.52%)
Of which: bullet and balloon loans	**91**	114	(23)	(20.18%)
Credit for purchases of motor vehicles[2]	**3,836**	4,375	(539)	(12.32%)
Debtors in respect of credit-card activity	**5,414**	4,905	509	10.38%
Total balance sheet credit risk	**41,005**	42,963	(1,958)	(4.56%)
Off-balance sheet				
Off-balance sheet credit risk	**20,999**	20,368	631	3.10%
Total credit risk	**62,004**	63,331	(1,327)	(2.10%)

* Credit risk is stated according to the location of the activity.
(1) Excluding loans for purchases of motor vehicles.
(2) Including loans granted for the purchase of motor vehicles or with a lien on a motor vehicle.

Table D-8: Information regarding problematic debts in respect of private individuals in Israel

	Balance as at		Change	Percentage of total balance sheet credit risk As at	
	June 30, 2019	December 31, 2018		**June 30, 2019**	December 31, 2018
	NIS millions				
Problematic credit risk	**851**	873	(2.52%)	**2.08%**	2.03%
Of which: impaired credit risk	**717**	694	3.31%	**1.75%**	1.62%
Debts in arrears of more than 90 days	**80**	107	(25.23%)	**0.20%**	0.25%
Net charge-offs for the period	**175**	473	[(1)](26.00%)	**[(1)]0.85%**	1.10%
Allowance for credit losses	**833**	892	(6.61%)	**2.03%**	2.08%

(1) Calculated on an annualized basis.

In the first half of 2019, the balance of loans to private individuals in Israel, including credit for the purchase of motor vehicles, decreased by 5.5%. Total balance sheet credit risk decreased by 4.6%. The decrease in balances in respect of private individuals continued consistently for the fifth consecutive quarter.

Concurrent with the decrease in balances, most indicators of portfolio quality show a continued improvement in this quarter. The percentage of impaired credit risk increased, as well as the percentage of problematic credit risk; however, excluding the increase in impaired credit risk, an ongoing trend is apparent of decreasing balances of unimpaired problematic credit risk. The percentage of debts in arrears of more than 90 days decreased from 0.25% in December 2018 to 0.20% in June 2019; in the second quarter, the percentage remained stable, while overall balances continued to decrease. The percentage of net charge-offs decreased significantly, from 1.10% in December 2018 to 0.85% in June 2019; this figure was lower in the second quarter than in the first quarter.

The improvement in the indicators, particularly the percentage of charge-offs, demonstrates the effect of the measures taken by the Bank to improve underwriting quality in credit for private individuals.

For additional information regarding the risk of credit to private individuals, see the section "Review of risks" in the Report of the Board of Directors and Board of Management as at March 31, 2019.

D.5. Leveraged financing

Data regarding credit risks of leveraged financing follow. The disclosure focuses on exposures of leveraged borrowers/transactions where the credit balance exceeds the amount of 0.5% of Tier 1 capital.

Table D-9: The Bank's exposures to leveraged financing, by economic sector of the borrower

	June 30, 2019			
	Number of borrowers	Balance sheet credit balance	Off-balance sheet credit balance	Total
		NIS millions		
Economic sector of the borrower				
Construction and real estate – construction	**1**	**252**	**-**	**252**
Construction and real estate – real-estate activities	**-**	**-**	**-**	**-**
Mining and quarrying	**2**	**1,292**	**31**	**1,323**
Information and communications	**1**	**266**	**-**	**266**
Commerce	**2**	**545**	**80**	**625**
Total	**6**	**2,355**	**111**	**2,466**

	December 31, 2018			
	Number of borrowers	Balance sheet credit balance	Off-balance sheet credit balance	Total
		NIS millions		
Economic sector of the borrower				
Construction and real estate – construction	1	257	-	257
Construction and real estate – real-estate activities	2	658	534	1,192
Mining and quarrying	2	1,361	38	1,399
Information and communications	1	266	-	266
Commerce	3	741	170	911
Industry	1	225	-	225
Total	10	3,508	742	4,250

D.6. Credit risk mitigation: standardized approach disclosures

Table D-10: Credit risk mitigation

June 30, 2019

	Unsecured	Secured							
	Total balance sheet balance	Total balance sheet balance	Of which: amount secured	Of which: by collateral		Of which: by financial guarantees		Of which: by credit derivatives	
				Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured
	NIS millions								
1 Debts, excluding bonds	**361,851**	**15,244**	**9,066**	**12,990**	**6,997**	**2,254**	**2,069**	**-**	**-**
2 Bonds	**61,787**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**
3 Total	**423,638**	**15,244**	**9,066**	**12,990**	**6,997**	**2,254**	**2,069**	**-**	**-**
4 Of which: impaired or in arrears of 90 days or more	**2,802**	**22**	**6**	**22**	**6**	**-**	**-**	**-**	**-**

June 30, 2018

	Unsecured	Secured							
	Total balance sheet balance	Total balance sheet balance	Of which: amount secured	Of which: by collateral		Of which: by financial guarantees		Of which: by credit derivatives	
				Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured
	NIS millions								
1 Debts, excluding bonds	364,903	20,388	13,292	12,105	5,657	8,283	7,635	-	-
2 Bonds	48,830	-	-	-	-	-	-	-	-
3 Total	413,733	20,388	13,292	12,105	5,657	8,283	7,635	-	-
4 Of which: impaired or in arrears of 90 days or more	2,973	48	7	48	7	-	-	-	-

December 31, 2018

	Unsecured	Secured							
	Total balance sheet balance	Total balance sheet balance	Of which: amount secured	Of which: by collateral		Of which: by financial guarantees		Of which: by credit derivatives	
				Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured	Balance sheet balance	Of which: amount secured
	NIS millions								
1 Debts, excluding bonds	377,488	20,225	13,779	11,841	5,993	8,384	7,786	-	-
2 Bonds	47,860	-	-	-	-	-	-	-	-
3 Total	425,348	20,225	13,779	11,841	5,993	8,384	7,786	-	-
4 Of which: impaired or in arrears of 90 days or more	3,358	62	45	62	45	-	-	-	-

Table D-11: Standardized approach – exposures by asset type and risk weight[(1)(2)]

		June 30, 2019								
		0%	20%	35%	50%	60%	75%	100%	150%	Total amount of credit exposures (after CCF and after CRM)
		NIS millions								
1	Sovereigns, central banks thereof, and national monetary authority	**108,049**	**4,675**	**-**	**41**	**-**	**-**	**362**	**69**	**113,196**
2	Public-sector entities (PSE) other than the central government	**2,047**	**252**	**-**	**4,188**	**-**	**-**	**-**	**-**	**6,487**
3	Banks (including multilateral development banks (MDB))	**216**	**17,335**	**-**	**5,035**	**-**	**-**	**63**	**-**	**22,649**
5	Corporations	**-**	**4,913**	**-**	**2,240**	**-**	**-**	**106,752**	**-**	**113,905**
6	Retail exposures to individuals	**-**	**-**	**-**	**-**	**-**	**56,161**	**-**	**-**	**56,161**
7	Loans to small businesses	**-**	**-**	**-**	**-**	**-**	**9,550**	**-**	**-**	**9,550**
8	Secured by a residential property	**-**	**-**	**28,075**	**23,696**	**6,964**	**23,030**	**3,664**	**-**	**85,429**
9	Secured by commercial real estate	**-**	**-**	**-**	**-**	**-**	**-**	**59,342**	**-**	**59,342**
10	Loans in arrears	**-**	**-**	**-**	**-**	**-**	**-**	**1,199**	**1,415**	**2,614**
11	Other assets*	**3,472**	**-**	**-**	**-**	**-**	**-**	**7,487**	**712**	**11,671**
11A	* Of which: in respect of shares	**-**	**-**	**-**	**-**	**-**	**-**	**1,305**	**476**	**1,781**
12	Total	**113,784**	**27,175**	**28,075**	**35,200**	**6,964**	**88,741**	**178,869**	**2,196**	**481,004**

(1) The balances in the disclosure include balance sheet and off-balance sheet balances reflecting credit risk, excluding amounts of deferred taxes and investments in financial corporations below deduction thresholds (which are subject to a risk weight of 250%), exposures in respect of counterparty credit risk, and securitization exposures.
(2) The balances reflect the supervisory exposure amounts net of allowances and charge-offs, after credit conversion factors and after credit risk mitigation methods.

Table D-11: Standardized approach – exposures by asset type and risk weight[1][2] (continued)

		June 30, 2018								
		0%	20%	35%	50%	60%	75%	100%	150%	Total amount of credit exposures (after CCF and after CRM)
		NIS millions								
1	Sovereigns, central banks thereof, and national monetary authority	112,066	4,910	-	70	-	-	391	12	117,449
2	Public-sector entities (PSE) other than the central government	2,191	474	-	4,397	-	-	-	-	7,062
3	Banks (including multilateral development banks (MDB))	283	13,264	-	4,756	-	-	90	-	18,393
5	Corporations	-	10,918	-	3,408	-	-	106,461	29	120,816
6	Retail exposures to individuals	-	-	-	-	-	65,488	-	-	65,488
7	Loans to small businesses	-	-	-	-	-	10,636	-	-	10,636
8	Secured by a residential property	-	-	27,557	20,351	1,481	24,667	3,547	-	77,603
9	Secured by commercial real estate	-	-	-	-	-	-	53,247	-	53,247
10	Loans in arrears	-	-	-	-	-	-	1,039	1,780	2,819
11	Other assets*	2,965	-	-	-	-	-	8,031	624	11,620
11A	* Of which: in respect of shares	-	-	-	-	-	-	1,558	454	2,012
12	Total	117,505	29,566	27,557	32,982	1,481	100,791	172,806	2,445	485,133

(1) The balances in the disclosure include balance sheet and off-balance sheet balances reflecting credit risk, excluding amounts of deferred taxes and investments in financial corporations below deduction thresholds (which are subject to a risk weight of 250%), exposures in respect of counterparty credit risk, and securitization exposures.

(2) The balances reflect the supervisory exposure amounts net of allowances and charge-offs, after credit conversion factors and after credit risk mitigation methods.

Table D-11: Standardized approach – exposures by asset type and risk weight[1][2] (continued)

		December 31, 2018								
		0%	20%	35%	50%	60%	75%	100%	150%	Total amount of credit exposures (after CCF and after CRM)
		NIS millions								
1	Sovereigns, central banks thereof, and national monetary authority	110,991	5,169	-	71	-	-	343	41	116,615
2	Public-sector entities (PSE) other than the central government	2,210	407	-	4,614	-	-	-	-	7,231
3	Banks (including multilateral development banks (MDB))	700	13,459	-	5,138	-	-	72	-	19,369
5	Corporations	-	5,993	-	2,437	-	-	112,778	-	121,208
6	Retail exposures to individuals	-	-	-	-	-	64,412	-	-	64,412
7	Loans to small businesses	-	-	-	-	-	9,656	-	-	9,656
8	Secured by a residential property	-	-	27,717	22,003	3,755	23,971	3,644	-	81,090
9	Secured by commercial real estate	-	-	-	-	-	-	54,660	-	54,660
10	Loans in arrears	-	-	-	-	-	-	1,231	1,957	3,188
11	Other assets*	3,166	-	-	-	-	-	8,060	640	11,866
11A	* Of which: in respect of shares	-	-	-	-	-	-	1,103	410	1,513
12	Total	117,067	25,028	27,717	34,263	3,755	98,039	180,788	2,638	489,295

(1) The balances in the disclosure include balance sheet and off-balance sheet balances reflecting credit risk, excluding amounts of deferred taxes and investments in financial corporations below deduction thresholds (which are subject to a risk weight of 250%), exposures in respect of counterparty credit risk, and securitization exposures.
(2) The balances reflect the supervisory exposure amounts net of allowances and charge-offs, after credit conversion factors and after credit risk mitigation methods.

E. Counterparty credit risks

Counterparty risk is defined at the Bank, according to the definition in Proper Conduct of Banking Business Directive 203, as the credit risk arising from transactions in derivative financial instruments. The risk is that the counterparty to the transaction will default before the final settlement of cash flows in the transaction. The market value of the transaction may be positive or negative for any of the parties to the transaction; the market value is not certain, and may change over time and according to movements in the underlying market-risk factors.

Table E-1: Analysis of exposure to counterparty credit risk based on the supervisory approach

		June 30, 2019				June 30, 2018			
		Replacement cost	Potential future exposure	EAD after CRM	RWA	Replacement cost	Potential future exposure	EAD after CRM	RWA
		NIS millions							
1	Present exposure method	**1,909**	**5,152**	**7,061**	**4,583**	3,419	6,146	9,565	6,621
3	Comprehensive approach to credit risk mitigation (for securities financing transactions (SFT))	**-**	**-**	**-**	**-**	-	-	-	-
6	Total	**1,909**	**5,152**	**7,061**	**4,583**	3,419	6,146	9,565	6,621

		December 31, 2018			
		Replacement cost	Potential future exposure	EAD after CRM	RWA
		NIS millions			
1	Present exposure method	2,886	6,383	9,269	6,449
3	Comprehensive approach to credit risk mitigation (for securities financing transactions (SFT))	-	-	-	-
6	Total	2,886	6,383	9,269	6,449

Table E-2: Capital allocation in respect of credit value adjustment

		June 30, 2019		June 30, 2018		December 31, 2018	
		EAD after CRM	RWA	EAD after CRM	RWA	EAD after CRM	RWA
		NIS millions					
3	Total portfolios in respect of which CVA is calculated according to the standardized approach	**7,061**	**2,629**	9,565	3,718	9,269	3,327

F. Market risk

Market risk is the risk of loss or decline in value as a result of change in the economic value of a financial instrument, or of a particular portfolio, due to changes in prices, rates, spreads, and other market parameters. This includes:

- **Interest-rate risk –** The risk of loss or decline in value as a result of changes in interest rates in the various currencies;
- **Currency risk –** The risk of loss as a result of changes in exchange rates;
- **Inflation risk –** The risk of loss as a result of changes in the curve of CPI expectations;
- **Share price risk –** The risk of loss as a result of changes in stock prices or in stock indices;
- **Credit spread risk –** The risk of loss as a result of change in the spread between the yield to maturity of corporate bonds traded in the markets and the relevant risk-free interest rate;
- **Volatility risk –** The risk of loss as a result of changes in the volatility rates quoted in the market;
- **Basis spread risk –** The risk of loss as a result of changes in the spreads between different interest-rate curves or different interest bases.

The main risk factors to which the Bank is exposed are NIS interest rates in the linked and unlinked segments, inflation, the NIS/USD exchange rate, and spreads between different interest-rate curves.

For more extensive information regarding market risks and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

F.1. Market risk in the trading book

Table F-1: Market risk based on the standardized approach

The Bank is required to allocate capital in respect of market risk assets, on the basis of a standardized model defined by the Bank of Israel. Regulatory capital adequacy is calculated for interest-rate and share risks, as defined above, in the trading book only, and for currency risks in the banking book and in the trading book.

		June 30, 2019	June 30, 2018	December 31, 2018
		Risk-adjusted assets in NIS millions		
	Direct products			
1	Interest-rate risk (general and specific)	**2,047**	2,181	2,302
2	Share position risk (general and specific)	**12**	90	82
3	Exchange-rate risk	**1,250**	613	738
4	Commodity risk	**-**	-	-
	Options			
5	Simplified approach	**-**	-	-
6	Delta-plus approach	**269**	328	307
7	Scenario approach	**-**	-	-
8	Securitization	**-**	-	-
9	Total	**3,578**	3,212	3,429

F.2. Interest-rate risk in the banking book

Interest-rate risk in the banking book refers to the potential effect of changes in the various interest-rate curves on the economic value of the Bank (i.e. change in the present value of assets and liabilities) and/or on net interest income (accounting income sensitivity). The risk emerges during the routine and proactive banking activity of the Bank, as a result of the provision of routine services to the general public and to the business and financial sectors, and from other activities; this includes interest-rate exposure arising from the management of the investment portfolio. The risk arises from differences in the structure of assets and liabilities – gaps between segments, durations, interest bases, interest-rate renewal dates, and more. Limits apply at the Bank both to the sensitivity of economic value and to the sensitivity of income (including financial subsidiaries under the Bank's management and subsidiaries with exposure significant for the Group) to scenarios of change in the NIS, CPI-linked NIS, and foreign-currency interest-rate curves.

Table F-2: Adjusted* net fair value of the financial instruments of the Bank and its consolidated companies

	June 30, 2019			December 31, 2018**		
	NIS	Foreign currency	Total	NIS	Foreign currency	Total
	NIS millions					
Adjusted net fair value*	**33,319**	**1,554**	**34,873**	32,971	1,120	34,091
Of which: banking book	**33,103**	**1,022**	**34,125**	32,822	741	33,563

* Net fair value of financial instruments, excluding non-monetary items and after the effect of employee benefit liabilities and attribution of on-demand deposits to the periods.

** Includes balances attributed to a discontinued operation.

For further details regarding assumptions used to calculate the fair value of financial instruments, see Note 15 to the Condensed Financial Statements.

Table F-3: Effect of scenarios of changes in interest rates on the adjusted* net fair value of the Bank and its consolidated companies

	June 30, 2019			December 31, 2018**		
	NIS	Foreign currency	Total	NIS	Foreign currency	Total
	NIS millions					
Parallel changes						
1% parallel increase	**333**	**248**	**581**	415	211	626
Of which: banking book	**300**	**287**	**587**	441	227	668
1% parallel decrease	**(318)**	**(303)**	**(621)**	(389)	(270)	(659)
Of which: banking book	**(312)**	**(271)**	**(583)**	(446)	(238)	(684)
Non-parallel changes						
Steepening(1)	**(86)**	**76**	**(10)**	(201)	119	(82)
Flattening(2)	**187**	**(34)**	**153**	124	(32)	92
Increase in short-term interest rate	**290**	**13**	**303**	122	178	300
Decrease in short-term interest rate	**(293)**	**(13)**	**(306)**	(278)	(207)	(485)

* Net fair value of financial instruments, excluding non-monetary items and after the effect of employee benefit liabilities and attribution of on-demand deposits to the periods.

** Includes balances attributed to a discontinued operation.

(1) Steepening – decrease in the short-term interest rate and increase in the long-term interest rate.

(2) Flattening – increase in the short-term interest rate and decrease in the long-term interest rate.

This table presents the change in the adjusted net fair value of all of the financial instruments under the assumption that the noted change occurs in all interest rates, in all linkage segments.

Table F-4: Sensitivity of the economic capital of the Bank to parallel changes in interest-rate curves (theoretical change in economic value as a result of each scenario)

	June 30, 2019			December 31, 2018		
	Unlinked NIS	CPI-linked NIS	Foreign currency	Unlinked NIS	CPI-linked NIS	Foreign currency
	NIS millions					
Parallel changes						
1% parallel increase	**100**	**(588)**	**271**	239	(506)	275
1% parallel decrease	**(55)**	**684**	**(286)**	(242)	592	(297)

The above table presents an analysis of the sensitivity of the Bank's economic value to changes in interest-rate curves, based, among other factors, on the discounting of expected cash flows by interest-rate curves that do not take into account the credit risk spread of the counterparty, with the use of internal models for some products. This differs from a fair-value calculation, which is based on factors including the discounting of expected cash flows by an interest rate reflecting the risk level inherent in the financial instrument, taking into consideration liabilities to employees, which are not used by the Bank in the management of economic value sensitivity. Sensitivity to a parallel decrease in the interest rate in the unlinked NIS curves decreased during the first half of 2019, mainly due to mortgage granting and bond purchases.

Table F-5: Effect of scenarios of changes in interest rates on interest income

	June 30, 2019			December 31, 2018		
	Interest income	Non-interest financing income	Total	Interest income	Non-interest financing income	Total
	NIS millions					
Parallel changes						
1% parallel increase	**834**	**372**	**1,206**	838	522	1,360
Of which: banking book	**834**	**354**	**1,188**	838	552	1,390
1% parallel decrease	**(690)**	**(398)**	**(1,088)**	(596)	(563)	(1,159)
Of which: banking book	**(690)**	**(382)**	**(1,072)**	(596)	(575)	(1,171)

Income sensitivity in the table above was calculated according to the management approach, which includes assumptions regarding models of current-account balances and the change in spreads of deposits with changes in the interest rate, in some of the scenarios, and involves the use of interest-rate floors. The sensitivity of the trading book was calculated using the MTM approach.

F.3. Share and credit spread risk – investment risk

Investment risk is defined at the Bank as exposure to the stock market, to credit spreads, and to credit risk in the bond and stock markets in the banking book of the Group (as a result of holdings in these products, the Bank may also be exposed to interest-rate risks and/or currency risks and/or liquidity risks, which are managed separately). According to the definition at the Bank, Israeli government bonds in NIS and in foreign currency and government bonds of the country in which a branch/subsidiary operates, held by the branch/subsidiary, do not bear investment risk, and are therefore not included in the measurement of investment risk at the Bank.

For more extensive information regarding investment risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

G. Liquidity risk

Liquidity risk – Liquidity risk is defined as present or future risk to the stability and profits of the Bank arising from an inability to sustain the cash flow required for its needs. Liquidity risk at the Bank is examined from a broader perspective, encompassing the ability to repay liabilities on schedule, including during times of stress, without damage to routine operations within the business plans of the Bank and without incurring exceptional losses.

Refinancing risk – The risk of inability to raise new resources to replace resources that have matured, or the risk that the reissue may be performed at durations and terms that damage the Bank's net interest income. This risk is managed as part of liquidity risk. In light of the financing sources of the Bank, the Bank does not view this risk as a material risk in its own right. The Bank accords high importance to raising resources that are stable and highly diversified.

Table G-1: Liquidity coverage ratio – limited banking corporation and consolidated subsidiaries, for the three-month period

	For the quarter ended June 30, 2019	
	Total unweighted value*	Total weighted value**
Total high-quality liquid assets		
Total high-quality liquid assets (HQLA)		**111,017**
Cash outflows		
Retail deposits from individuals and from small business customers, of which:	**200,304**	**15,215**
Stable deposits	**65,283**	**3,264**
Less stable deposits	**94,668**	**10,740**
Deposits for a period greater than 30 days (Section 84 of Proper Conduct of Banking Business Directive 221)	**40,353**	**1,211**
Unsecured wholesale financing, of which:	**110,200**	**69,265**
Operational deposits (all counterparties) and deposits in networks of cooperative banks	**1,951**	**488**
Non-operational deposits (all counterparties)	**107,860**	**68,388**
Unsecured debts	**389**	**389**
Secured wholesale financing	**3**	**-**
Additional liquidity requirements, of which:	**99,052**	**22,096**
Outflows related to derivative exposure and other collateral requirements	**13,629**	**12,333**
Outflows related to loss of funding on debt products	**-**	**-**
Credit and liquidity facilities	**85,423**	**9,763**
Other contractual funding obligations	**7,026**	**7,026**
Other contingent funding obligations	**52,943**	**1,775**
Total cash outflows		**115,377**
Cash inflows		
Secured lending (e.g. reverse repos)	**600**	**600**
Inflows from fully performing exposures	**22,460**	**15,481**
Other cash inflows	**17,094**	**12,049**
Total cash inflows	**40,154**	**28,130**

	Total adjusted value***
Total high-quality liquid assets (HQLA)	**111,017**
Total net cash outflows	**87,247**
Liquidity coverage ratio (%)	**127%**

* Unweighted values were calculated as outstanding balances maturing or callable within 30 days (for inflows and outflows), based on an average of daily observations.

** Weighted values were calculated after the application of respective haircuts or inflow and outflow rates (for inflow and outflow), based on an average of daily observations. The number of observations used to calculate the averages in the reported quarter is 59.

*** Adjusted values were calculated after the application of: (1) haircuts and inflow and outflow rates; and (2) any applicable caps (i.e. caps on level 2B and level 2 assets for HQLA and a cap on inflows).

Table G-1: Liquidity coverage ratio – limited banking corporation and consolidated subsidiaries, for the three-month period (continued)

	For the quarter ended June 30, 2018*	
	Total unweighted value**	Total weighted value***
Total high-quality liquid assets		
Total high-quality liquid assets (HQLA)		110,310
Cash outflows		
Retail deposits from individuals and from small business customers, of which:	191,029	14,825
Stable deposits	62,303	3,115
Less stable deposits	91,848	10,604
Deposits for a period greater than 30 days (Section 84 of Proper Conduct of Banking Business Directive 221)	36,878	1,106
Unsecured wholesale financing, of which:	109,736	70,465
Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,703	426
Non-operational deposits (all counterparties)	107,730	69,736
Unsecured debts	303	303
Secured wholesale financing	14	-
Additional liquidity requirements, of which:	110,460	25,396
Outflows related to derivative exposure and other collateral requirements	18,057	16,326
Outflows related to loss of funding on debt products	-	-
Credit and liquidity facilities	92,403	9,070
Other contractual funding obligations	15,206	15,206
Other contingent funding obligations	58,194	1,952
Total cash outflows		127,844
Cash inflows		
Secured lending (e.g. reverse repos)	661	661
Inflows from fully performing exposures	28,933	21,818
Other cash inflows	20,624	15,886
Total cash inflows	50,218	38,365

	Total adjusted value****
Total high-quality liquid assets (HQLA)	110,310
Total net cash outflows	89,479
Liquidity coverage ratio (%)	123%

* Includes balances attributed to a discontinued operation.

** Unweighted values were calculated as outstanding balances maturing or callable within 30 days (for inflows and outflows), based on an average of daily observations. The number of observations used to calculate the averages in the reported quarter is 60.

*** Weighted values were calculated after the application of respective haircuts or inflow and outflow rates (for inflow and outflow), based on an average of daily observations.

**** Adjusted values were calculated after the application of: (1) haircuts and inflow and outflow rates; and (2) any applicable caps (i.e. caps on level 2B and level 2 assets for HQLA and a cap on inflows).

Table G-1: Liquidity coverage ratio – limited banking corporation and consolidated subsidiaries, for the three-month period (continued)

	For the quarter ended December 31, 2018*	
	Total unweighted value**	Total weighted value***
Total high-quality liquid assets		
Total high-quality liquid assets (HQLA)		106,375
Cash outflows		
Retail deposits from individuals and from small business customers, of which:	195,062	15,032
Stable deposits	63,494	3,175
Less stable deposits	93,346	10,710
Deposits for a period greater than 30 days (Section 84 of Proper Conduct of Banking Business Directive 221)	38,222	1,147
Unsecured wholesale financing, of which:	107,845	69,011
Operational deposits (all counterparties) and deposits in networks of cooperative banks	1,738	435
Non-operational deposits (all counterparties)	105,776	68,245
Unsecured debts	331	331
Secured wholesale financing	8	-
Additional liquidity requirements, of which:	118,042	27,613
Outflows related to derivative exposure and other collateral requirements	19,765	17,957
Outflows related to loss of funding on debt products	-	-
Credit and liquidity facilities	98,277	9,656
Other contractual funding obligations	15,827	15,827
Other contingent funding obligations	55,580	1,834
Total cash outflows		129,317
Cash inflows		
Secured lending (e.g. reverse repos)	894	894
Inflows from fully performing exposures	29,486	22,556
Other cash inflows	21,795	17,352
Total cash inflows	52,175	40,802

	Total adjusted value****
Total high-quality liquid assets (HQLA)	106,375
Total net cash outflows	88,515
Liquidity coverage ratio (%)	120%

* Includes balances attributed to a discontinued operation.

** Unweighted values were calculated as outstanding balances maturing or callable within 30 days (for inflows and outflows), based on an average of daily observations.

*** Weighted values were calculated after the application of respective haircuts or inflow and outflow rates (for inflow and outflow), based on an average of daily observations. The number of observations used to calculate the averages in the reported quarter is 64.

**** Adjusted values were calculated after the application of: (1) haircuts and inflow and outflow rates; and (2) any applicable caps (i.e. caps on level 2B and level 2 assets for HQLA and a cap on inflows).

The calculation of the ratio during this quarter was influenced by the sale of the Isracard Group. After the sale, the status of Isracard in the calculation of the consolidated liquidity risk ratio changed from a subsidiary to a financial company.

The average ratio during the quarter (the average of the daily observations) is 127%, consolidated, and 126% for the stand-alone banking corporation, while the minimum requirement is 100%. This ratio increased during the second quarter of 2019, in comparison to the preceding quarter. The increase in the ratio mainly resulted from the issuance of securities on the stock exchange at the end of the first quarter and during the second quarter of 2019. There is some volatility from day to day during the month, and some interchange between NIS and foreign currency, mainly due to activity in derivatives.

The liquid assets of the Bank mainly consist of Israeli government bonds in NIS and in foreign currency, US government bonds in foreign currency, and deposits with central banks (the Bank of Israel and the Federal Reserve). Part of the liquid assets are held by the Bank, and part are held by the subsidiaries. The Bank takes into consideration possible restrictions on the transfer of liquidity between some subsidiaries and the Bank itself, particularly banking subsidiaries overseas. Accordingly, some of the subsidiaries hold liquid assets for times of crisis (or a credit line from the parent company), according to need, and the Bank does not rely on these assets. The Bank manages the liquidity coverage ratio, and accordingly its liquid assets, with a separation of NIS and foreign currencies. For details of liquid assets by level, see the table below. The Board of Directors of the Bank has adopted an internal limit stricter than the regulatory LCR requirement, both for the stand-alone banking corporation and consolidated.

The main source of funding of the Bank is deposits from retail customers and small businesses in Israel, which generate low liquidity risk relative to other resources. In addition, the Bank obtains financing through issues, deposits from corporate and financial companies, and more. Funding in foreign currency includes deposits of private customers and corporate clients in Israel, foreign residents, Israeli companies abroad, issues of CDs and other instruments secured by the FDIC in the United States, and additional resources. Deposits from corporate and financial entities with a maturity date of up to one month are subject to high outflow coefficients, pursuant to the directive, and therefore have a relatively large contribution to cash outflow. The Bank monitors the concentration of funding sources, in various breakdowns, in both NIS and foreign currency, and complies with the internal limits in this area. The Bank does not rely on funding from the capital market as a major financing source.

Derivatives create a large inflow and a large outflow, and lead to redirection of liquid assets and net cash outflow between NIS and foreign currency, but their net contribution in all currencies is low. In the calculation of liquid assets, the Bank does not include collateral which it is required to deposit against derivatives activity; volatility in the volume of this deposit is taken into consideration, as required in the directive.

Liquidity and refinancing risks are managed based on a global view of the Bank's activity in Israel, at its overseas branches, and at subsidiaries with significant liquidity risk for the Group. Liquidity risk at the Bank, in foreign currency and in NIS, is managed and controlled routinely at the Asset and Liability Management Division, in accordance with Group policy, with the aim of ensuring the ability to cope competitively even in exceptional supply and demand situations in the financial markets. Current liquidity management is under the responsibility of the Asset and Liability Management Division, and is executed through NIS and foreign-currency liquidity units, and through corresponding units at the subsidiaries. Reports to Board of Management committees are submitted on a monthly basis; reports to Board of Directors committees are submitted on a quarterly basis. Additional reports to internal functions for monitoring and management purposes are submitted more frequently. The business plan of the Bank takes expected business changes, future liquidity requirements, and future liquidity risks into consideration, in order to ensure that the Bank continues to comply with all limits. The Market and Liquidity Risk Management Department in the Risk Management Area routinely monitors liquidity using internal and environmental parameters, independently reports the risk level to the committees of the Board of Management and the Board of Directors, and challenges the parameters in the various models related to liquidity.

Table G-2: Details of liquid assets, by level, as required in the Basel directives

	Balance as at June 30, 2019	**Average in the quarter ended June 30, 2019**
	NIS millions	
Level 1 assets	**103,385**	**109,462**
Level 2A assets	**1,168**	**1,198**
Level 2B assets	**341**	**357**
Total HQLA	**104,894**	**111,017**

	Balance as at June 30, 2018	Average in the quarter ended June 30, 2018
	NIS millions	
Level 1 assets	108,279	109,490
Level 2A assets	874	626
Level 2B assets	246	194
Total HQLA	109,399	110,310

	Balance as at December 31, 2018	Average in the quarter ended December 31, 2018
	NIS millions	
Level 1 assets	105,564	105,039
Level 2A assets	1,181	1,030
Level 2B assets	315	306
Total HQLA	107,060	106,375

For additional information regarding liquidity risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

H. Operational risk

Operational risk is defined as the risk of loss that may be caused by failed or faulty internal processes, human actions, system malfunctions, or external events. The definition includes legal risk, but does not include strategic risk or reputational risk. Failures related to one of the aforesaid factors may cause damage to profitability. The Bank operates control units, including Information Systems Security and Cyber Defense, Business Continuity, Security, the Compliance Officer, and Anti-Money Laundering and Terrorism Financing Prevention, as well as comprehensive procedures and systems in areas related to banking activity, management of human resources, process control, emergency operation, and more.

For additional information regarding operational risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

I. Compliance risk

Compliance risk is the risk of imposition of a legal or regulatory sanction, material financial loss, or reputational damage which the banking corporation may suffer as a result of a failure to comply with the compliance directives, as defined in Proper Conduct of Banking Business Directive 308.

Pursuant to Proper Conduct of Banking Business Directive 308, compliance risk also includes risks related to the fairness of the Bank towards its customers, conflicts of interest, the prohibition of money laundering and financing of terrorism (including with respect to tax laws), provision of advice to customers, securities enforcement, protection of privacy (excluding information-technology aspects), the US FATCA directives and the international CRS directives, and taxation aspects relevant to products or services for customers, or directives of a similar nature. Compliance risk also includes the reputational risk that accompanies failure to comply with such directives.

Imposition of monetary sanctions by the Supervisor of Banks: Over the last few months, there has been an increase in instances of monetary sanctions imposed on banks and credit-card companies (including the Bank and Isracard) by the Banking Supervision Department, in cases in which, according to the position of the Banking Supervision Department, flaws or deficiencies have been discovered in the conduct of the financial institutions. For details and more extensive information, see the "Other matters" section of the Corporate Governance Report, in the Condensed Financial Statements.

For additional information regarding compliance risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

J. Legal risk

Legal risk includes, among other matters, legal claims, rulings, inability to enforce contracts, and exposure to fines, penalties, or punitive damages as a result of supervisory actions and private settlements that may disrupt or adversely affect the activity of the Bank Group. The Group has a structure of internal and external legal counsel in order to contend with this risk.

For additional information regarding legal risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018; the Annual Financial Statements for 2018 and Note 25 to the Annual Financial Statements for 2018; and Note 10 to the Condensed Financial Statements as at June 30, 2019.

K. Reputational risk

Reputational risk is defined as present or future risk of damage to income or capital as a result of a negative image in the eyes of relevant stakeholders, such as customers, parties to transactions, shareholders, investors, or regulatory agencies. This risk, which usually accompanies other activities and other risks, may materialize in various ways, such as customer departures, new regulation, and more.

For additional information regarding reputational risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

L. Regulatory risk

Regulatory risk is risk to the Group's income and/or capital arising from legislative processes and/or draft directives of various regulatory agencies that cause changes in the Group's business environment. Such changes may occasionally influence the Group's ability to offer certain services, and/or may obligate the Group to carry out technological and other investments at considerable cost, while disrupting schedules for development of other planned services.

For additional information regarding regulatory and legislative risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

For details regarding material regulatory initiatives with an effect on the activity of the Bank during the reported period, see Note 16 to the Condensed Financial Statements as at June 30, 2019.

M. Economic risk

Risk factors in the economic environment are identified by the Economics Department, which tracks current economic and financial data in Israel and worldwide and professionally evaluates the implications of the data. The department maps potential risks in the economy and in the financial markets, and reports to the relevant teams and committees.

For additional information regarding economic risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

For details regarding conditions in the Israeli and global economy, see the section "Economic review" in the Report of the Board of Directors and Board of Management as at June 30, 2019.

N. Strategic risk

Strategic risk is material present or future risk to profits, capital, reputation, or status that may be caused by changes in the business environment; faulty business decisions; improper implementation of strategy or business decisions; or failure to respond to changes in the industry (e.g. competitors' actions), the economy, or technology. Strategic risk is also a function of the congruence of the organization's strategic objectives with its environment, adaptation of the business plans that it develops to achieve these objectives, resource allocation, and quality of implementation. As such, this risk constitutes forward-looking information.

For additional information regarding strategic risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.

O. Environmental risk

Environmental risk to the Bank is the risk of loss as a result of directives related to the protection of the environment and the enforcement thereof, which may materialize if the Bank bears direct responsibility for an environmental hazard, including the possibility that the Bank may be required to remove an environmental hazard, or may be liable to a third party in respect of an environmental hazard, or as a result of the impairment of realized collateral. This risk may also materialize indirectly as a result of the deterioration of the financial condition of another entity due to environmental costs stemming from directives related to the protection of the environment. Reputational risk may also materialize as a result of the association of the Bank to a party causing environmental damage.

For additional information regarding environmental risk and the management thereof, see the Report on Risks: Pillar 3 Disclosure and Additional Information Regarding Risks as at December 31, 2018, and the Annual Financial Statements for 2018.