

Pillar 3 disclosures

Macquarie Bank
March 2021



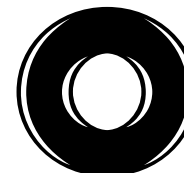
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MACQUARIE
BANK

ASX Release

MACQUARIE BANK RELEASES MARCH PILLAR 3 DISCLOSURE DOCUMENT

25 May 2021 - The Macquarie Bank Limited March 2021 Pillar 3 disclosure document was released today. These disclosures have been prepared in accordance with the Australian Prudential Regulation Authority (APRA) requirements of Prudential Standard APS 330: Public Disclosure.

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Introduction

Macquarie Bank Limited (MBL) is an Authorised Deposit-taking Institution (ADI) regulated by the Australian Prudential Regulation Authority (APRA). MBL is accredited under the Foundation Internal Ratings Based Approach (FIRB) for credit risk, the Advanced Measurement Approach (AMA) for operational risk, the Internal Model Approach (IMA) for market risk and interest rate risk in the banking book. These advanced approaches place a higher reliance on a bank's internal capital measures and therefore require a more sophisticated level of risk management and risk measurement practices.

APRA has implemented the Basel III framework, and in some areas has gone further by introducing stricter requirements (APRA superequivalence). This report details MBL's disclosures as required by APRA Prudential Standard APS 330: Public Disclosure as at 31 March 2021 together with the 31 March 2020 comparatives where appropriate.

This report also describes Macquarie's risk management policies and risk management framework and the measures adopted to monitor and report within this framework. Detailed in this report are the major components of capital structure, the key risk exposures and the associated capital requirements. The key risk exposures are credit risk (including securitisation exposures, credit valuation adjustment, and exposures to central counterparties), market risk, operational risk and interest rate risk in the banking book. Each of these risks are individually discussed in later sections of this report where the individual risk components, measurement techniques and management practices are detailed.

On 1 April 2021, APRA announced actions required regarding MBL's risk management practices and ability to calculate and report key prudential ratios. APRA increased MBL's operational capital requirement and made adjustments to requirements for certain liquidity prudential ratios, effective from 1 April 2021. The actions relate to specific intra-group funding arrangements as well as breaches of APRA's reporting standards on liquidity between 2018 and 2020. APRA noted that the breaches are historical and do not impact the current overall soundness of Macquarie Group's capital and liquidity positions. While specific historical matters leading to these actions have been addressed, Macquarie acknowledges that continued work is required on its risk governance and operating platform and has programs in place to strengthen capital and liquidity reporting and its risk management framework. Macquarie will work closely with APRA on these programs through a period of intensified supervision.

Ratios for Common Equity Tier 1, Total Tier 1, Total capital, Leverage and Liquidity are set out below.

APS 330 Table 6 (g)

	As at 31 March 2021	As at 31 March 2020
Capital, Liquidity and Leverage Ratios – Level 2 regulatory group		
Common Equity Tier 1 capital ratio ⁽¹⁾	12.6%	12.2%
Tier 1 capital ratio ⁽¹⁾	14.3%	13.6%
Total capital ratio ⁽¹⁾	18.8%	15.2%
Leverage ratio	5.5%	5.7%
Liquidity coverage ratio ⁽¹⁾⁽²⁾⁽³⁾	174%	174%
Net stable funding ratio ⁽¹⁾⁽⁴⁾	115%	118%
Capital Ratios – Level 1 regulatory group		
Common Equity Tier 1 capital ratio ⁽¹⁾⁽⁵⁾	12.0%	11.3%
Tier 1 capital ratio ⁽¹⁾⁽⁵⁾	13.7%	12.7%
Total capital ratio ⁽¹⁾⁽⁵⁾	18.1%	14.3%

⁽¹⁾ The Macquarie Level 1 and Level 2 regulatory group capital and liquidity ratios are above the regulatory minimum required by APRA, and the Board imposed internal minimum requirement.

⁽²⁾ The Liquidity Coverage Ratio for the 3 months to 31 March 2021 is calculated from 62 daily LCR observations (31 March 2020 is calculated from 63 daily LCR observations).

⁽³⁾ As announced on 1 April 2021, APRA has imposed a 15% add-on to the Net Cash Outflow component of the LCR calculation, effective from 1 April 2021. The pro forma 3 month average LCR to 31 March 2021 including this add-on is 151%.

⁽⁴⁾ As announced on 1 April 2021, APRA has imposed a 1% decrease to the Available Stable Funding component of the NSFR calculation, effective from 1 April 2021. The pro forma NSFR at 31 March 2021 including this adjustment is 114%.

⁽⁵⁾ As announced on 1 April 2021, APRA has imposed a Level 1 operational capital overlay of \$A500m on MBL, effective from 1 April 2021. The proforma Level 1 Common Equity Tier 1, Tier 1 and Total capital ratios at 31 March 2021 including this overlay are 11.3%, 12.9% and 17.0% respectively.

APRA requires Authorised Deposit-taking Institutions (ADIs) to have a minimum ratio of Tier 1 capital to risk weighted assets (RWA) of 8.5% at both Level 1 and Level 2, including the 2.5% capital conservation buffer, with at least 7.0% in the form of Common Equity Tier 1 capital. In addition, APRA may impose ADI specific minimum capital ratios which may be higher than these levels.

At 31 March 2021, the countercyclical capital buffer requirement for Macquarie Level 2 regulatory group is less than 1 basis point.

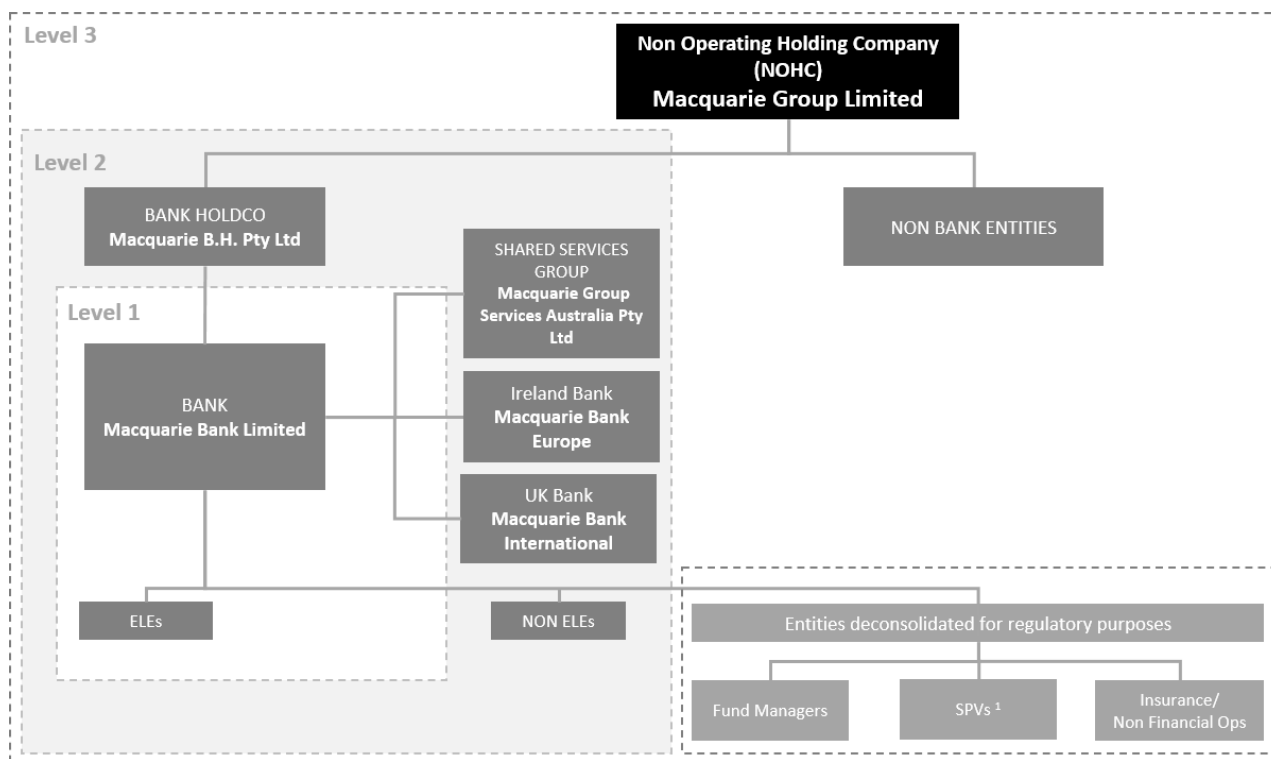
1.0 Overview

1.1 Scope of Application

MBL, as an approved ADI, is required to comply with the disclosure requirements of APS 330 on a Level 2 basis, as described below.

1.1.1 Macquarie Regulatory Group

The regulatory consolidated group is different to the accounting consolidated group and identifies three different levels of consolidation as illustrated below:



1. These are securitisation vehicles that achieve Regulatory Capital Relief per APS 120.

Reporting levels are in accordance with APRA definitions contained in APRA Prudential Standard APS 110: Capital Adequacy.

MBL and certain subsidiaries which meet the APRA definition of Extended Licensed Entities (ELE) are reported to APRA as Level 1. Level 2 consists of MBL, its subsidiaries and its immediate parent (Macquarie B.H. Pty Ltd) but excluding certain subsidiaries of MBL which are required by APRA to be deconsolidated for APRA reporting purposes. Equity investments into these entities by the Level 2 group are required to be deducted from Common Equity Tier 1 (CET1) capital under APRA Prudential Standard APS 111 Capital Adequacy: Measurement of Capital. The subsidiaries which are deconsolidated for regulatory purposes include mortgage and leasing special purpose vehicles (SPVs) for which Macquarie has satisfied APS 120 Attachment A operational requirements for regulatory capital relief and entities conducting insurance, funds management and non-financial operations. These deconsolidated entities result in the Macquarie Level 2 group for regulatory purposes differing from MBL and its subsidiaries, the Consolidated Entity for accounting purposes. Therefore, the disclosures made in this report are for a different group of entities to those made in the financial report of MBL and its subsidiaries, the Consolidated Entity. A list of entities deconsolidated for Level 2 reporting purposes is included in Appendix 2.

References in this report to Macquarie refer to the Level 2 regulatory group as described above. Unless otherwise stated, all disclosures in this report represent the Level 2 regulatory group prepared on an APRA Basel III basis.

MBL is part of the larger Macquarie Group Limited Consolidated Group (MGL Group), which includes Macquarie Group Limited (MGL) and its subsidiaries (referred to as 'Level 3'). APS 330 does not require disclosures relating to the Level 3 Group, however, some limited Level 3 disclosures are made in this report (refer Section 4.0).

Comments on policies in this report generally reflect policies adopted across the MGL Group, unless it is stated that the policies are specific to any one part of the group.

1.0 Overview

continued

1.2 Frequency

The qualitative disclosures in this report are required to be updated on an annual basis and more frequently if significant changes to policies are made. This report has been updated as at 31 March 2021 and policies disclosed within are effective at this time. The capital adequacy and summarised credit risk exposure quantitative disclosures are published on a quarterly basis. All other quantitative disclosures are published semi-annually in conjunction with Macquarie's half year (30 September) and annual (31 March) reporting cycles.

1.3 Report Conventions

The disclosures in this report are not required to be audited by an external auditor. However, the disclosures have been prepared on a basis consistent with information submitted to APRA. Under the revised APS 310 Audit and Related Matters, the information submitted to APRA is required to be either audited or reviewed by an external auditor at Macquarie's year end, being 31 March.

Averages have been prepared in this report for certain disclosures as required by APS 330.

All numbers in this report are in Australian Dollars and have been rounded to the nearest million, unless otherwise stated.

Where necessary, comparative information has been restated to conform with changes in presentation in the current year, unless otherwise stated.

The Appendices include a Glossary of Terms used throughout this document.

1.4 Overview of the Basel III Regulatory Capital Framework

Basel III is designed to raise the resilience of the banking sector by strengthening the regulatory capital framework, building on the three pillars of the Basel II framework. The framework seeks to increase the sensitivity to risk in the capital calculations and to ensure that this is aligned with an ADI's internal processes for assessing risk. Consequently, there are a number of different approaches to risk calculation that allows use of internal models to calculate regulatory capital. A bank may be accredited to use the advanced approaches when it can demonstrate the integrity and sophistication of its risk management framework. It must also ensure that its internal estimates of risk are fully integrated into corporate governance functions as well as internal calculations of capital. Further to this, the most advanced approaches are available if a bank has sufficient depth and history of default data to enable it to generate its own Probability of Default (PD) estimates based on its own loss experience.

The requirements of Basel III are contained within three broad sections or 'Pillars'.

1.4.1 Pillar 1

The first section of the Basel III framework covers the rules by which Risk Weighted Assets (RWA) and capital adequacy must be calculated.

Macquarie has been approved by APRA to apply the FIRB approach for credit risk capital calculation. This approach utilises the PD and internal rating assigned to the obligor. The exposure is weighted using this internal PD and a Loss Given Default (LGD) value set by APRA. Credit Conversion Factors are applied to off balance sheet exposures based on the nature of the exposure. Operational risk is calculated using the AMA.

Market risk and interest rate risk in the banking book is calculated using the internal model approach.

1.4.2 Pillar 2

Pillar 2 (the Supervisory Review Process) of the Basel III framework requires ADIs to make their own assessments of capital adequacy in light of their risk profile and to have a strategy in place for maintaining their capital levels. Macquarie's Internal Capital Adequacy Assessment Process (ICAAP) addresses its requirements under Pillar 2.

The ICAAP is part of Macquarie's overall risk management framework; its key features include:

- Comprehensive risk assessment process;
- Internal assessment of capital adequacy using Macquarie's economic capital model (refer Section 4.1);
- Risk appetite setting (refer Section 4.2);
- Capital management plans designed to ensure the appropriate level and mix of capital given Macquarie's risk profile; and
- Regular reporting of capital adequacy and monitoring of risk profile against risk appetite.

Macquarie's ICAAP is subject to Board and senior management oversight and internal control review.

1.4.3 Pillar 3

These disclosures have been formulated in response to the requirements of Pillar 3 of the Basel III Framework. APRA has laid down the minimum standards for market disclosure in its APS 330.

This report includes a breakdown of both on and off-balance sheet exposures, RWA and Liquidity measures. The report consists of sections covering:

- Risk Management Governance and Framework
- Capital Management
- Credit Risk Measurement
- Provisioning
- Credit Risk Mitigation
- Securitisation
- Credit Valuation Adjustment
- Exposures to Central Counterparties
- Market Risk
- Equity Risk
- Operational Risk
- Leverage Ratio
- Liquidity Coverage Ratio
- Net Stable Funding Ratio

2.0 Risk Management Governance and Framework

2.1 Risk Governance at Macquarie

Role of the Board

The role of the Board is to promote the long-term interests of Macquarie, taking into account Macquarie's specific and broader responsibilities to its shareholders, funders, clients, staff and the communities in which it operates. The Board is committed to oversight of Macquarie's performance, risk management, engagement with regulators and culture and to promoting the creation of enduring value by realising opportunities for the benefit of our clients, community, shareholders and our people. Macquarie's robust risk management framework supports the Board in its role. The Board is ultimately responsible for the framework, including oversight of its operation by Management.

Role of Management

The Group Heads of the Operating and Central Service Groups are responsible for implementation of the risk management framework in their groups. They are required semi-annually to attest that key risks have been identified and are adequately controlled in their groups. These management representations support the sign-off of the half year and the full year financial statements.

Three lines of defence

Macquarie's approach to risk management adopts the 'three lines of defence' model in which risk ownership responsibilities are functionally independent from oversight and assurance:

- primary responsibility for risk management lies with the business. The risk owner is the first line of defence. An important part of the role of all staff throughout Macquarie is to ensure they manage risks appropriately
- the Risk Management Group (RMG) forms the second line of defence and provides independent and objective review and challenge, oversight, monitoring and reporting in relation to Macquarie's material risks
- Internal Audit, as the third line, provides independent and objective risk-based assurance on the compliance with, and effectiveness of, the Group's financial and risk management framework.

2.2 Macquarie's Risk Management Framework

Macquarie's risk management framework is the totality of systems, structures, policies, processes and people within Macquarie that identify, measure, monitor, report and control or mitigate internal and external sources of material risk. Material risks are those that could have a material impact, financial or non-financial on Macquarie. Macquarie's material risks include aggregate, asset, conduct, credit, environmental and social (including climate change), equity, financial crime, legal, liquidity, market, operational (including cyber and information security), regulatory and compliance, reputational, strategic, tax, and work health and safety risks. The risk management framework applies to all Operating and Central Service Groups.

Core risk management principles

Macquarie's approach to risk management is based on stable and robust core risk management principles. These are:

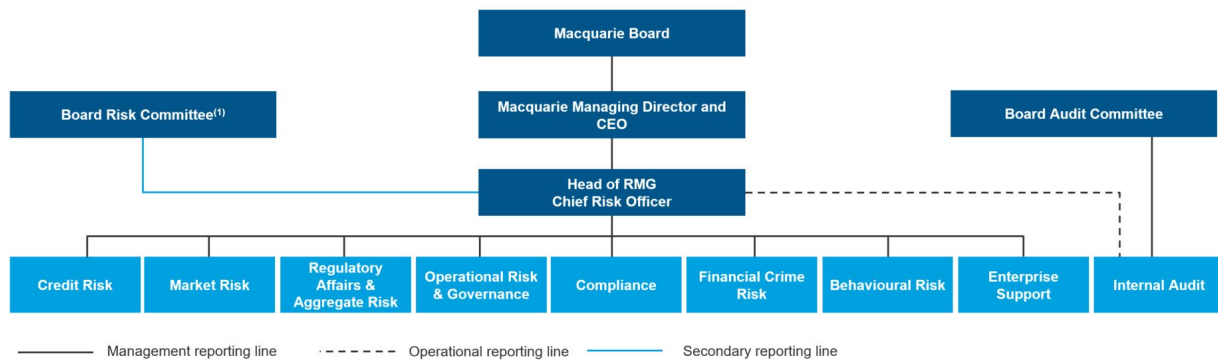
- **ownership of risk at the business level:** Group Heads are responsible for ownership of all material risks that arise in, or because of, the business' operations, including identification, measurement, control and mitigation of these risks. Before taking decisions, clear analysis of the risks is sought to ensure those taken are consistent with the risk appetite and strategy of Macquarie
- **understanding worst-case outcomes:** Macquarie's risk management approach is based on examining the consequences of worst-case outcomes and determining whether these are acceptable and within Macquarie's risk appetite. This approach is adopted for all material risk types and is often achieved by stress testing. Macquarie operates a number of sophisticated quantitative risk management processes, but the foundation of the approach is the informed consideration of both quantitative and qualitative inputs by highly experienced professionals
- **requirement for an independent sign-off by RMG:** Macquarie places significant importance on having a strong, independent risk management function charged with signing off all material risk acceptance decisions. It is essential that RMG has the capability to do this effectively. RMG has invested in recruiting skilled professionals from a range of disciplines, including those with trading or advisory and capital markets experience. For all material proposals, RMG's opinion must be sought at an early stage in the decision-making process. The approval document submitted to Senior Management must include independent input from RMG on risk and return.

2.0 Risk Management Governance and Framework continued

2.3 Risk Management Group Structure

RMG, which forms the second line of defence, is an independent and centralised function responsible for independent and objective review and challenge, oversight, monitoring and reporting in relation to Macquarie’s material risks. RMG designs and oversees the implementation of the risk management framework.

RMG is structured into specialist functional divisions, depicted below, and employs an integrated approach to risk analysis and management across risk classes. RMG’s assessment and monitoring of risks involves a collaborative effort across the divisions to ensure a detailed analysis takes place both at the individual and aggregate risk level. Effective risk management is a function of both rigorous processes and the ability of experienced professionals to provide new perspectives on the risks they are considering. RMG attracts high calibre candidates. It recruits experienced individuals both from within Macquarie and externally.



(1) The Board Risk Committee assists the Board by providing oversight of Macquarie’s risk management framework and advising the Board on Macquarie’s risk appetite, risk culture and risk management strategy. In addition, the Board Governance and Compliance Committee assists the Board in fulfilling its responsibility for monitoring the regulatory and compliance risk framework of Macquarie, including the conduct risk management framework, and reviews and monitors Macquarie’s work health and safety, environmental and social risk management policies and customer and client reporting.

2.3.1 Internal Audit

The Internal Audit Division, as the third line, provides independent and objective risk-based assurance to the Board Audit Committee (BAC), other Board Committees and Senior Management on the compliance with, and effectiveness of, Macquarie’s financial and risk management framework, including its governance, systems, structures, policies, processes and people for managing material risks. Internal Audit assesses whether material risks have been properly identified by management and key internal controls have been properly designed and are operating effectively and sustainably to mitigate those material risks.

The BAC has primary power of direction over the Internal Audit Division and is accountable for reviewing the effectiveness of the Internal Audit function. The Head of Internal Audit reports functionally to the BAC and is primarily accountable to them. The Head of Internal Audit has unrestricted access to the Committee and its Chair and meets privately with the BAC members regularly during the year. The BAC monitors and reviews the performance, degree of independence and remuneration of the Head of Internal Audit. The BAC also approves any appointment and removal of the Head of Internal Audit. The Head of Internal Audit reports operationally to the CRO for day-to-day management.

3.0 Capital Structure

3.1 Total Available Capital

The Macquarie Level 2 regulatory group capital supply is detailed in the table below.

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Common Equity Tier 1 capital		
Paid-up ordinary share capital	8,521	8,508
Retained earnings	5,253	4,350
Reserves	305	990
Gross Common Equity Tier 1 capital	14,079	13,848
Regulatory adjustments to Common Equity Tier 1 capital:		
Goodwill	39	47
Deferred tax assets	793	489
Net other fair value adjustments	(110)	(12)
Intangible component of investments in subsidiaries and other entities	35	53
Loan and lease origination fees and commissions paid to mortgage originators and brokers	497	441
Shortfall in provisions for credit losses	63	317
Equity exposures	695	588
Capitalised Software	55	69
Other Common Equity Tier 1 capital deductions	172	203
Total Common Equity Tier 1 capital deductions	2,239	2,195
Net Common Equity Tier 1 capital	11,840	11,653
Additional Tier 1 capital		
Additional Tier 1 capital instruments	1,628	1,315
Gross Additional Tier 1 capital	1,628	1,315
Deductions from Additional Tier 1 capital	-	-
Net Additional Tier 1 capital	1,628	1,315
Total Net Tier 1 capital	13,468	12,968
Tier 2 capital		
Tier 2 capital instruments and other	4,223	1,592
Total capital base	17,691	14,560

3.0 Capital Structure

continued

3.2 Common Equity Tier 1 Capital

Macquarie's Common Equity Tier 1 capital under Basel III consists of ordinary share capital, retained earnings and certain reserves.

3.3 Additional Tier 1 Capital

Macquarie's Tier 1 capital consists of Common Equity Tier 1 capital and Additional Tier 1 capital (hybrids).

Macquarie's Additional Tier 1 capital consists of Macquarie Additional Capital Securities (MACS) and Bank Capital Notes 2 (BCN2).

MACS were issued by MBL, acting through its London Branch in March 2017. MACS are subordinated, unsecured notes that pay discretionary, non-cumulative, semi-annual fixed rate cash distributions. Subject to certain conditions the MACS may be redeemed on 8 March 2027, or every 5th anniversary thereafter. MACS can be exchanged for a variable number of fully paid MGL ordinary shares on an acquisition event (where a person acquires control of MBL or MGL), where MBL's common equity Tier 1 capital ratio falls below 5.125%, or where APRA determines MBL would be non-viable without an exchange or a public sector injection of capital (or equivalent support).

BCN2 were issued by MBL in June 2020 and are quoted on the Australian Securities Exchange. The BCN2 pay discretionary, quarterly floating rate cash distributions equal to three month BBSW plus 4.70% per annum margin, adjusted for franking credits. These instruments are non-cumulative and unsecured and may be redeemed at face value on 21 December 2025, 21 June 2026 or 21 December 2026 (subject to certain conditions being satisfied) or earlier in specified circumstances. The BCN2 can be converted into a variable number of MGL ordinary shares (subject to certain conditions being satisfied) on these redemption dates; mandatorily exchanged on 21 December 2028; exchanged earlier upon an acquisition event (with the acquirer gaining control of MGL or MBL); or where APRA determines MBL would be non-viable without an exchange or a public sector injection of capital (or equivalent support).

MIS were repaid on 15 April 2020, followed by a redemption on 16 April 2020. MIS were a perpetual instrument with no ordinary equity conversion rights. MIS were listed for trading on the Australian Stock Exchange (now known as the Australian Securities Exchange) in 1999. MIS distributions were paid quarterly at a floating rate of BBSW plus 1.7% per annum and payment was subject to certain conditions including profitability of the Bank. MIS were included in Additional Tier 1 capital under Basel III transitional rules.

3.4 Tier 2 Capital

Macquarie's Tier 2 capital consists of a portion of certain credit loss reserves plus subordinated debt instruments. A portion of subordinated debt is included under Basel III transitional rules which require the value recognised to amortise by 10% each year until no part of the instruments are included after 10 years.

MBL has issued cumulative convertible subordinated debt amounting to \$US750 million in June 2015, \$A750 million in May 2020, \$US750 million in June 2020, \$US1,000 million in March 2021 which are Basel III compliant and not subject to the transitional rules referred to above. This is reported at the value of liability at the period end date.

3.5 Restrictions on Capital

Various restrictions or costs exist on the transfer of capital within the Macquarie accounting consolidated group. For example:

- Licensed entities such as Australian Financial Services Licensed (AFSL) entities are required to maintain minimum capital requirements to comply with their licence. Macquarie seeks to maintain a sufficient level of capital within these entities to ensure compliance with these regulations;
- Where retained earnings are transferred from related entities, tax costs may be payable on repatriation which may reduce the actual amount of available capital;
- As an ADI, Macquarie is subject to the prudential limits imposed by APRA Prudential Standard APS 222: Associations with Related Entities;
- RMG also manage and monitor internal limits on exposures to related entities which, combined with APRA's prudential limits, seeks to minimise contagion risk.

4.0 Capital Adequacy

4.1 Capital Management

Macquarie's capital management strategy is to maximise shareholder value through optimising the level and use of capital resources, whilst also providing the flexibility to take advantage of opportunities as they may arise.

The capital management objectives are to:

- continue to support Macquarie's credit rating;
- ensure sufficient capital resources to support Macquarie's business and operational requirements;
- maintain sufficient capital to exceed externally imposed capital requirements; and
- safeguard Macquarie's ability to continue as a going concern.

Macquarie's capital management strategy uses both internal and external measures of capital. Internally, Macquarie has developed an economic capital model that is used to quantify MGL Group's aggregate level of risk. The economic capital framework complements the management of specific risk types such as equity, credit, market and operational risk by providing an aggregate view of MGL Group's risk profile.

The economic capital model is used to support business decision-making and has two main applications:

- capital adequacy assessment; and
- risk-adjusted performance measurement.

Capital adequacy is assessed for both MGL Group and the Level 2 regulatory group. In each case, capital adequacy is assessed on a regulatory basis and on an economic basis, with capital requirements assessed as follows:

Economic capital adequacy means an internal assessment of capital adequacy, designed to ensure Macquarie has sufficient capital to absorb potential losses and provide creditors with the required degree of protection.

Potential losses are quantified using the Economic Capital Adequacy Model (ECAM). These potential losses are compared to the capital resources available to absorb loss, consisting of book equity and eligible hybrid equity. Earnings are also available to absorb losses, however, only a fraction of potential earnings is recognised as a buffer against losses.

APRA has approved Macquarie's ECAM for use in calculating the regulatory capital requirement of the Non-Bank Group.

The ECAM is based on similar principles and models as the Basel III regulatory capital framework for banks, as shown in the table below with both calculating capital at a one year, 99.9% confidence level. This 99.9% confidence level is broadly consistent with the acceptable probability of default implied by Macquarie's credit ratings.

Entity	Regulatory	Economic
Level 2 regulatory group	Capital to cover RWA and regulatory deductions, according to APRA's ADI prudential standards	Internal model, covering exposures of the Bank Group
MGL Group	Level 2 regulatory group capital requirement plus economic capital requirement of the Non-Bank Group	Internal model, covering all exposures of the MGL Group

Risk ⁽¹⁾	Basel III	ECAM
Credit	Capital requirement generally determined by Basel III IRB formula, with some parameters specified by the regulator (e.g. loss given default)	Capital requirement generally determined by Basel III IRB formula, but with internal estimates of key parameters
Equity	Harmonised Basel III: 250%, 300% or 400% risk weight, depending on the type of investment ⁽²⁾ , Deduction from Common Equity Tier 1 above a threshold APRA Basel III: 100% Common Equity Tier 1 deduction	Extension of Basel III credit model to cover equity exposures. Capital requirement between 34% and 84% of face value; average 52%
Market	3 times 10 day 99% Value at Risk (VaR) plus 3 times 10 day 99% Stressed Value at Risk (SVaR), plus a specific risk charge	Scenario-based approach
Operational	Advanced Measurement Approach	Advanced Measurement Approach

⁽¹⁾ The ECAM also covers non-traded interest rate risk and the risk on assets held as part of business operations, including: fixed assets, goodwill, intangible assets, capitalised expenses.

⁽²⁾ Includes all Banking Book equity investments, plus net long Trading Book holdings in financial institutions.

Macquarie's Level 3 regulatory group is currently well capitalised. The capital surplus is available to support growth, provide strategic flexibility and accommodate regulatory change and capital volatility. In order to reduce volatility in Macquarie's capital position, Macquarie actively manages the sensitivity of its capital position to foreign currency movements.

The capital adequacy results are reported to the MGL Board and senior management on a regular basis, together with projections of capital adequacy under a range of scenarios.

4.0 Capital Adequacy

continued

4.2 Risk Appetite Setting

Macquarie's risk appetite is the degree of risk that the Group is prepared to accept in pursuit of its strategic objectives and business plan. This is detailed in Macquarie's Board approved *Risk Appetite Statement* (RAS). The RAS describes Macquarie's risk appetite, being the nature and amount of risk that Macquarie is willing to accept in pursuit of an appropriate and resilient long-term return on its capital. The RAS states transactions must generate returns proportionate to the risks. Accordingly, a risk and return analysis is required for all significant new deals, products and businesses.

The RAS is accessible to all staff and is referred to in the *Code of Conduct*. The principles of the RAS are implemented primarily through the following mechanisms:

Policies

Policies are a key tool to ensure that risks taken are consistent with the Board approved RAS. They set out the principles that govern the acceptance and management of risks. They are designed to influence and determine all major decisions and actions, and all activities must take place within the boundaries set by them.

Limits

In many cases, limits translate risk appetite principles into hard constraints on individual businesses. These consist of granular limits for specific risk types as well as the Global Risk Limit that constrains Macquarie's aggregate level of risk. Macquarie sets the Global Risk Limit with reference not only to capital but also to earnings so that in a prolonged, severe downturn, earnings and surplus capital are sufficient to cover losses and maintain market confidence in Macquarie.

Under Macquarie's 'no limits, no dealing' approach, compliance with specific limits is monitored by the Business and RMG. These granular limits are set to allow businesses to achieve their near-term plans while promoting a reassessment of the opportunity and associated risks as the limit is approached.

New product and business approval process

All new businesses and significant changes to existing products, processes or systems are subject to a rigorous, interactive approval process that adheres to the principles stated in the RAS. This results in constructive dialogue on risk matters between RMG and the relevant business.

This formal process is designed so that the proposed transaction or operation can be managed properly, without creating unwanted risks for Macquarie. All relevant risks are reviewed to ensure they are identified and addressed prior to implementation. These risks are also monitored on an ongoing basis. The approvals of RMG, Financial Management Group, Legal and Governance and other relevant stakeholders within Macquarie are obtained. RMG also checks that all necessary internal approvals are obtained prior to commencement. The Operational Risk and governance division within RMG oversees the new product and business approval process.

The Risk Appetite Test – An aggregate stress test

The key tool that the Board uses to quantify aggregate risk appetite is the Risk Appetite Test. This is a Macquarie-wide stress test that considers losses and earnings under a severe economic downturn scenario with the aim of Macquarie emerging from that scenario with sufficient capital to continue operating.

The Risk Appetite Test asserts that potential losses must be less than the Global Risk Limit, which comprises underlying earnings that Macquarie can achieve in a downturn (downturn forward earnings capacity) plus surplus regulatory capital. Consideration is also given to the year-by-year outcome of the modelled downturn scenario to ensure that market confidence is maintained.

Operating Groups and Divisions estimate downturn forward earnings capacity under a downturn scenario provided to them by RMG. RMG reviews the estimates for consistency with scenario assumptions and across groups.

Aggregate risk breaks down into two categories:

- **Business risk**, meaning decline in earnings through deterioration in volumes and margins due to market conditions; and
- **Potential losses**, including potential credit losses, write-downs of equity investments, operational risk losses and losses on trading positions.

Business risk is captured by the difference in base case and downturn forward earnings estimates. Potential losses are quantified using stress testing models, which translate scenario parameters (GDP, unemployment, interest rates etc) into loss and transition rates. A principal use of the Risk Appetite Test is in setting the Equity Risk Limit (ERL). This limit constrains Macquarie's aggregate level of risk arising from principal equity positions, managed fund holdings, property equity investments and other equity investments. Any changes to the ERL are sized to ensure that even under full use of this limit and allowing for growth in other risk types, the requirements of the Risk Appetite Test will be met.

4.3 Risk Weighted Assets (RWA)

RWA are a risk based measure of exposures used in assessing overall capital usage of the Level 2 regulatory group. When applied against eligible regulatory capital the overall capital adequacy ratio is determined. RWA are calculated in accordance with APRA Prudential Standards.

The table below sets out the RWA exposures for the Macquarie Level 2 regulatory group.

APS 330 Table 6 (b) to (f)

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Credit risk		
Subject to IRB approach		
Corporate	25,444	29,246
SME Corporate	4,629	3,581
Sovereign	1,199	382
Bank	1,423	1,499
Residential Mortgages	21,461	17,757
Other Retail	3,501	4,220
Retail SME	2,952	3,515
Total RWA subject to IRB approach	60,609	60,200
Specialised lending exposures subject to slotting criteria⁽¹⁾		
Subject to Standardised approach		
Corporate	92	262
Residential Mortgages	690	740
Other Retail	1,513	1,928
Total RWA subject to Standardised approach	2,295	2,930
Credit risk RWA for securitisation exposures	759	758
Credit Valuation Adjustment RWA	3,931	7,635
Exposures to Central Counterparties RWA	736	835
RWA for Other Assets	2,412	2,089
Total Credit risk RWA	77,589	80,992
Market risk RWA	5,660	3,971
Operational risk RWA	10,337	10,655
Interest rate risk in the banking book RWA⁽²⁾	414	–
Total RWA	94,000	95,618

⁽¹⁾ Specialised lending exposures subject to supervisory slotting criteria are measured using APRA determined risk weightings.

⁽²⁾ The IRRBB RWA were revised from \$373m to \$414m subsequent to Macquarie's FY2021 results announcement on 7 May 2021.

5.0 Credit Risk Measurement

5.1 Credit Risk Overview

Credit risk is defined as the risk that a counterparty will fail to complete its contractual obligations when they fall due (default risk) or changes in the creditworthiness of the obligor (migration risk). The consequent loss is either the amount of the loan or financial obligation not paid back, the change in the value of a non-traded debt instrument, or the loss incurred in replicating a trading contract with a new counterparty.

RMG Credit maintains a comprehensive and robust framework for the identification, analysis and monitoring of credit risks arising in each business. Key aspects of this framework are detailed below.

5.2 Credit Risk Management

Macquarie's philosophy on credit risk management reflects the principle of separating prudential control from operational management. The responsibility for approval of initial credit limits is delegated to specific individuals.

Credit risk approvals reflect two principles:

- a requirement for dual sign-off; and
- a requirement that, above specified limits, all credit exposures must be approved outside the business line proposing to undertake them.

5.2.1 Analysis and Approval of Exposures

The MGL and MBL Boards are responsible for establishing the framework for approving credit exposures. The Boards delegate discretions to approve credit exposure to designated individuals within the Group whose capacity to prudently exercise authority has been assessed.

Operating groups are assigned modest levels of credit discretions. Credit exposures above these levels are assessed independently by RMG and approved by experienced RMG staff, the CEO and the Boards as required.

Macquarie enforces a strict 'no limit, no dealing' rule. All proposed transactions are analysed and approved by designated individuals before they can proceed.

All wholesale credit exposures are reviewed at least once a year, or more frequently if required. Retail credit exposures are monitored on a portfolio basis.

5.2.2 Macquarie Ratings

All corporate, sovereign and bank counterparties (wholesale) customer limits and exposures are allocated a Macquarie Group rating (MQ rating) which broadly correspond with Standard and Poor's (S&P) and Moody's Investor Services credit ratings. Each MQ rating has been assigned a PD derived from Standard and Poor's long term average one year default rates for similarly rated obligors. A LGD percentage is additionally assigned to each limit and exposure, reflecting the economic loss estimated to result if default occurs, taking into account the security supporting the credit exposure.

Ratings provided by External Credit Assessment Institutions (ECAI) are considered throughout the rating process but are supplementary to the internal rating process.

The table on next page outlines the internal MQ Ratings relative to ECAI ratings.

MQ ratings are used to:

- assess the default risk of credit exposures for management reporting, credit approval of limits, risk attribution and regulatory purposes;
- assist in credit decisions by providing guidelines and tools that promote a more consistent analytical approach;
- assist in the process of sharing credit knowledge (including knowledge of specialised and unique companies, industries and products); and
- provide a basis for disclosing and reporting to investors and the market.

Each MQ rating band is associated with an estimate of the PD by the counterparty on its financial obligations and provides a consistent measure across the Level 2 regulatory group. Applicable at either the borrower or transaction level, a rating must be justified and set as part of the credit approval and review process.

The ratings process combines a quantitative analysis by way of scoring industry specific risk factors and a qualitative assessment based on expert judgement.

5.2.2 Macquarie Ratings (continued)

Rating System

Macquarie	S&P	Moody's
MQ1	AAA	Aaa
MQ2	AA+	Aa1
	AA	Aa2
	AA-	Aa3
MQ3	A+	A1
MQ4	A	A2
MQ5	A-	A3
MQ6	BBB+	Baa1
MQ7	BBB	Baa2
MQ8	BBB-	Baa3
MQ9	BB+	Ba1
MQ10	BB	Ba2
MQ11	BB-	Ba3
MQ12	B+	B1
MQ13	B	B2
MQ14	B-	B3
MQ15	CCC+	Caa1
	CCC	Caa2
	CCC-	Caa3
MQ16	CC	Ca
	C	C
MQ99	D	D

5.0 Credit Risk Measurement continued

For wholesale counterparties, Macquarie utilises a number of industry templates and a sovereign template to assess the appropriate MQ ratings. These industry templates are designed to ensure that Macquarie ratings take into account the different risk factors that affect different industries. Analysts are required to input a range of quantitative and qualitative factors and then consider the MQ rating output. At the same time as considering the appropriate MQ rating, analysts are also required to consider the appropriate LGD. For economic capital purposes, LGDs are stressed estimates, taking into account the security, jurisdiction, seniority and quality of the balance sheet. For regulatory capital, MBL uses the APRA supervisory estimates for LGDs.

For retail counterparties, PDs and LGDs are assigned to retail pools. Retail exposures are allocated to pools, such that each pool has homogenous risk. PDs and LGDs are calculated using the following methods:

- **PDs:** calculate the long-run average default rate from the internal and external default data available for each pool. When internal data is not available in sufficient quantity, external data is used but only in the case where it is relevant to the pool.
- **LGDs:** consider a downturn scenario and the loss that would be incurred for this scenario on defaulted loans in each pool.

Macquarie applies a standard definition of default, which is that an item is considered defaulted when it is either (i) 90 days past due; or (ii) unlikely to pay. 'Unlikely to pay' is defined in Macquarie policies based on APRA standards.

All templates and models are validated annually by RMG Aggregate Risk with oversight from the Credit Models Review Committee. The following annual validation activities are undertaken:

- validation of wholesale ratings templates;
- validation of wholesale PD estimates;
- validation of wholesale LGD estimates;
- wholesale ratings migration analysis;
- validation of retail PDs;
- validation of retail LGDs; and
- approval of any changes to credit risk models.

Macquarie has developed system functionality to support the allocation of internal ratings. This application ensures that all supporting factors and weightings are stored together with the system-generated rating. Approvers have access to all of these details through the credit approval process. Details are also maintained of any rating override which must be accompanied by specific commentary from the credit analyst and which is subject to regular review.

Macquarie considers that ratings are an integral part of determining the creditworthiness of the obligor. However, Macquarie does not believe that model and template output should replace thorough and thoughtful analysis. In addition to the system details, credit analysts must also provide specific justification of the internal rating as part of their overall credit analysis of each counterparty. Credit approvers consider and approve the internal rating for the counterparty in relation to the size and tenor of their proposed credit limits.

All proposals for significant deals, products and businesses must contain an analysis of risk-adjusted returns, based on the ECAM which for credit exposures is a function of the assessed credit rating (together with other factors such as maturity and estimates of LGD). In assessing these proposals, the Executive Committee and Board consider these returns together with other relevant factors. They therefore form an important element in ensuring the visibility and impact of the MQ rating to the overall risk acceptance decision.

Risk-adjusted performance metrics for each business unit are prepared on a regular basis and distributed to senior management and the Board as well as to business units. These performance metrics are based on Regulatory Capital and Economic Capital usage and are a factor when allocations of performance-based remuneration are determined for each business.

5.2.3 Measuring and Monitoring Exposures

Credit exposures are calculated differently according to the nature of the obligation. Materially all loan assets are reported at amortised cost, whereas derivative contracts are reported at fair value according to both internal and external regulatory measures of Counterparty Credit Exposure. Exposures are assessed in the context of the replacement cost of the contract should the counterparty default prior to the maturity of the trade.

Derivative revaluation based measures are calculated using valuation models which are consistent with those used for determining mark to market values for financial reporting purposes and are reported daily to RMG Credit.

For regulatory purposes, exposure at default is calculated according to the Standardised Approach to Counterparty Credit Risk (SA-CCR) outlined in APRA ADI Prudential Standards 180 (APS 180) and comprises of replacement cost (RC) and potential future exposure (PFE). The RC is a function of derivative revaluation, collateralisation and the terms of any variation margin agreement in place with a counterparty. The PFE is a function of the outstanding notional of derivative contracts with a counterparty, the nature of these contracts, the level of collateralisation and whether these contracts are subject to variation margining. The sum of the RC and the PFE is subject to a regulatory prescribed scaling factor, the alpha multiplier, which equals 1.4.

The internal measure of counterparty credit exposure is calculated as a function of market movements. A range of exposure profiles are calculated using models based simulated scenarios through the life of the portfolio, the resultant exposure is then ranked to reflect different confidence levels. At a minimum, counterparty credit limits are set for all businesses against a consistent low probability (high confidence) profile. The effect of this limit framework is to ensure that there is a low probability of exposures exceeding the original approved limit. The models and parameters used to determine future asset prices and consequent portfolio exposures are reviewed and approved by RMG quarterly, significant changes in volatility or market conditions result in more frequent reviews.

High confidence level exposure measures are supplemented by regular and ad hoc exposure sensitivity analysis to evaluate the effect of extreme stress on the portfolio.

Exposure relating to derivatives are calculated on a net basis where appropriate legal netting arrangements are in effect. The details of what products can be netted for each counterparty are recorded in legal documentation systems. These systems are tightly integrated into the exposure calculation functionality and serve to ensure that netting is only performed when the legal basis for this has been formally assessed and confirmed.

Where trading gives rise to settlement risk, this risk is normally assessed at full face value of the settlement amount. However, Macquarie utilises a number of market standard clearing mechanisms to ensure that the bulk of settlements are effected on a secured basis or through exchanges where a Delivery vs payment (DVP) settlement process is ensured.

Contingent exposures arising from the issuance of guarantees, letters of credit and performance bonds are also reported daily.

On and off-balance sheet exposures are considered together for approval, monitoring and reporting purposes. Credit exposures of all types are calculated and reported daily.

Each business is responsible for calculating their credit exposures to ensure that they stay within credit limits. In addition, these exposures are supplied to RMG Credit on a daily basis for centralised limit monitoring. Any excesses identified are investigated and escalated as appropriate to both business line and RMG management. All reportable excesses are summarised and reported to the Board monthly. All wholesale limits and ratings are reviewed at least once a year, or more frequently if necessary, to ensure any deterioration is identified and reflected in an adjustment to limits and/or their MQ rating. Furthermore, other indicators of deterioration in credit quality are regularly monitored, such as share price and credit default swap spread movements, covenant breaches and external credit ratings downgrades. Where appropriate, these are reported to senior management and where recoverability is in doubt, appropriate provisions are held.

A review of the Credit, Equity and Asset Portfolio analysing exposure concentrations by counterparty, country, risk type, industry and credit quality is carried out quarterly and reported to the Board semi-annually. Policies are in place to limit large exposures to single counterparties and sectoral concentrations.

5.2.4 Credit Assurance

Credit Assurance (CA) is a centralised function within RMG which independently verifies the effectiveness of Macquarie's credit risk management. The role of the CA is to provide an independent assurance of analysis and process to support credit quality and the effectiveness of credit controls.

Key responsibilities are:

- assuring the quality of wholesale credit approvals through sample testing;
- reporting on the effectiveness (design and performance) of RMG Credit's critical controls including sample testing to ensure compliance with key Credit policies and the effectiveness of critical controls; and
- overseeing Business (Retail) CA functions in Banking and Financial Services (BFS).

RMG CA reports to the RMG Head of Operational Risk and Governance to ensure independence. In addition to regular reporting to senior management and the Chief Risk Officer, CA is required to report at least annually to the Board. In the interim, matters that require Board attention are reported via the Chief Risk Officer.

5.0 Credit Risk Measurement

continued

5.3 Macquarie's Credit Risk Exposures

Credit exposures are disclosed in the following pages based on:

- geographic distribution;
- maturity profile;
- measurement approach;
- risk weight banding; and
- risk grade.

Disclosures in this section have been prepared on a gross credit exposure basis. Gross credit risk exposure relates to the potential loss that Macquarie would incur as a result of a default by an obligor. The gross credit risk exposures are calculated as the amount outstanding on drawn facilities and the exposure at default on undrawn facilities along with derivatives and repurchase agreements. The exposure at default is calculated in a manner consistent with APRA Prudential Standards.

Exposures have been based on a Level 2 regulatory group as defined in Section 1.1.1. The gross credit risk exposures in this section will differ from the disclosures in the MBL and its subsidiaries, the Consolidated Entity financial report as gross credit risk exposures include off balance sheet exposures but exclude the exposures of subsidiaries which have been deconsolidated for APRA reporting purposes.

The exposures below exclude the impact of:

- credit risk mitigation (discussed in Section 8);
- securitisation exposures (discussed in Section 9);
- CVA (discussed in Section 10);
- central counterparty exposures (discussed in Section 11)
- trading book on balance sheet exposures (discussed in Section 12); and
- equity exposures (discussed in Section 13).

APS 330 Table 7(b)

Portfolio Type	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Corporate ⁽¹⁾⁽²⁾	47,211	53,374
SME Corporate ⁽¹⁾⁽³⁾	7,398	5,888
Sovereign	15,925	5,205
Bank	7,402	7,569
Residential Mortgages	81,799	64,393
Other Retail	8,182	9,822
Retail SME	4,400	4,831
Other Assets ⁽⁴⁾	5,920	6,901
Total Gross Credit Exposure	178,237	157,983

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line). Comparatives as at 31 March 2020 have been restated.

⁽²⁾ Corporate includes specialised lending exposure of \$4,526 million as at 31 March 2021 (31 March 2020: \$5,156 million).

⁽³⁾ SME Corporate includes specialised lending exposure of \$2,357 million as at 31 March 2021 (31 March 2020: \$1,554 million).

⁽⁴⁾ The major components of Other Assets are related party exposures, unsettled trades and fixed assets.

APS 330 Table 7(b) (continued)

	As at 31 March 2021			Total \$m	For the 12 months to 31 March 2021 Average Exposures ⁽¹⁾ \$m
	On Balance Sheet \$m	Off Balance sheet			
		Non-market related \$m	Market related \$m		
Subject to IRB approach					
Corporate	14,232	9,261	19,099	42,592	45,274
SME Corporate	3,949	1,092	–	5,041	4,688
Sovereign	12,496	3,242	187	15,925	10,565
Bank	3,189	1,477	2,736	7,402	7,485
Residential Mortgages	68,787	11,890	–	80,677	71,917
Other Retail	6,608	–	–	6,608	7,220
Retail SME	4,389	11	–	4,400	4,616
Total IRB approach	113,650	26,973	22,022	162,645	151,765
Specialised Lending	4,093	955	1,836	6,884	6,797
Subject to Standardised approach					
Corporate	–	92	–	92	177
Residential Mortgages	1,122	–	–	1,122	1,180
Other Retail	1,574	–	–	1,574	1,782
Total Standardised approach	2,696	92	–	2,788	3,139
Other Assets	4,393	919	608	5,920	6,410
Total Gross Credit Exposures	124,832	28,939	24,466	178,237	168,111

⁽¹⁾ Average exposures have been calculated on 31 March 2021 and 31 March 2020 year end spot positions.

5.0 Credit Risk Measurement

continued

APS 330 Table 7(b) (continued)

	As at 31 March 2020			Total \$m	For the 12 months to 31 March 2020 Average Exposures ⁽¹⁾ \$m
	On Balance Sheet \$m	Off Balance sheet			
		Non-market related \$m	Market related \$m		
Subject to IRB approach					
Corporate	17,585	8,607	21,764	47,956	43,122
SME Corporate	3,636	698	–	4,334	4,276
Sovereign	2,200	2,705	300	5,205	4,490
Bank	3,414	724	3,431	7,569	7,525
Residential Mortgages	53,401	9,755	–	63,156	55,296
Other Retail	7,831	–	–	7,831	7,937
Retail SME	4,816	15	–	4,831	5,070
Total IRB approach	92,883	22,504	25,495	140,882	127,716
Specialised Lending	3,673	815	2,222	6,710	5,279
Subject to Standardised approach					
Corporate	–	262	–	262	297
Residential Mortgages	1,237	–	–	1,237	1,255
Other Retail	1,991	–	–	1,991	2,397
Total Standardised approach	3,228	262	–	3,490	3,949
Other Assets	5,074	1,096	731	6,901	8,298
Total Gross Credit Exposures	104,858	24,677	28,448	157,983	145,242

⁽¹⁾ Average exposures have been calculated on 31 March 2020 and 31 March 2019 year end spot positions.

APS 330 Table 7(f) & (i)

	As at 31 March 2021				For the 12 months to 31 March 2021	
	Gross Credit Exposure \$m	Impaired Facilities \$m	Past Due > 90 days \$m	Specific Provisions \$m	Charges for Specific Provisions \$m	Write-offs ⁽²⁾ \$m
Subject to IRB approach						
Corporate ⁽¹⁾	47,119	344	13	(154)	(110)	-
SME Corporate ⁽¹⁾	7,398	165	49	(42)	(24)	-
Sovereign	15,925	-	-	-	-	-
Bank	7,402	-	-	-	-	-
Residential Mortgages	80,677	442	196	(6)	(4)	-
Other Retail	6,608	117	-	(32)	(15)	-
Retail SME	4,400	95	3	(25)	(35)	-
Total IRB approach	169,529	1,163	261	(259)	(188)	-
Subject to Standardised approach						
Corporate	92	-	-	-	-	-
Residential Mortgages	1,122	-	-	-	-	-
Other Retail	1,574	48	1	(24)	(26)	-
Total Standardised approach	2,788	48	1	(24)	(26)	-
Other Assets	5,920	-	-	-	-	-
Total	178,237	1,211	262	(283)	(214)	-

⁽¹⁾ IRB Corporate and SME Corporate includes specialised lending.

⁽²⁾ Under AASB 9, there are no longer direct write-offs to Income Statement. A financial asset is written-off when there is no reasonable expectation of recovering it. At the time of writing-off a financial asset it is adjusted against the Expected Credit Loss (ECL) provision created over the life of the asset and not directly written-off to Income Statement.

5.0 Credit Risk Measurement

continued

APS 330 Table 7(f) & (i)

	As at 31 March 2020				For the 12 months to 31 March 2020	
	Gross Credit Exposure \$m	Impaired Facilities \$m	Past Due > 90 days \$m	Specific Provisions \$m	Charges for Specific Provisions \$m	Write-offs ⁽⁴⁾ \$m
Subject to IRB approach						
Corporate ⁽¹⁾⁽²⁾⁽³⁾	53,112	473	25	(155)	(182)	–
SME Corporate ⁽¹⁾⁽²⁾⁽³⁾	5,888	133	33	(45)	(38)	–
Sovereign	5,205	–	–	–	–	–
Bank	7,569	–	–	–	–	–
Residential Mortgages ⁽³⁾	63,156	414	163	(7)	(5)	–
Other Retail ⁽³⁾	7,831	135	–	(31)	(25)	–
Retail SME ⁽³⁾	4,831	110	2	(21)	(31)	–
Total IRB approach	147,592	1,265	223	(259)	(281)	–
Subject to Standardised approach						
Corporate	262	–	–	–	–	–
Residential Mortgages	1,237	–	–	–	–	–
Other Retail ⁽³⁾	1,991	46	3	(19)	(33)	–
Total Standardised approach	3,490	46	3	(19)	(33)	–
Other Assets	6,901	8	–	–	–	–
Total	157,983	1,319	226	(278)	(314)	–

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

⁽²⁾ IRB Corporate and SME Corporate includes specialised lending.

⁽³⁾ The impaired facilities, past due and specific provisions figures have been reclassified for a portion of the Business Banking portfolio, with balances now reflected in the Residential Mortgages, Retail SME and Other Retail lines (moved from the SME Corporate and Corporate lines).

⁽⁴⁾ Under AASB 9, there are no longer direct write-offs to Income Statement. A financial asset is written-off when there is no reasonable expectation of recovering it. At the time of writing-off a financial asset it is adjusted against the Expected Credit Loss (ECL) provision created over the life of the asset and not directly written-off to Income Statement.

5.4 Credit Risk by Geographic Distribution

The credit risk exposures below have been based on a geographical split by domicile of the counterparty.

APS 330 Table 7(c)

Portfolio Type	As at 31 March 2021				
	Asia Pacific \$m	Australia \$m	EMEA [*] \$m	Americas \$m	Total \$m
Corporate	3,189	9,326	17,028	17,668	47,211
SME Corporate	3	7,395	–	–	7,398
Sovereign	110	12,990	1,772	1,053	15,925
Bank	811	2,382	2,907	1,302	7,402
Residential Mortgages	284	81,293	141	81	81,799
Other Retail	–	7,669	341	172	8,182
Retail SME	–	4,400	–	–	4,400
Other Assets	673	2,959	733	1,555	5,920
Total Gross Credit Exposure	5,070	128,414	22,922	21,831	178,237

* EMEA represents Europe, United Kingdom, Middle East and Africa

Portfolio Type	As at 31 March 2020				
	Asia Pacific \$m	Australia \$m	EMEA ⁽¹⁾ \$m	Americas \$m	Total \$m
Corporate ⁽²⁾	4,249	10,061	20,812	18,252	53,374
SME Corporate ⁽²⁾	–	5,888	–	–	5,888
Sovereign	462	1,127	2,169	1,447	5,205
Bank	1,339	2,012	2,354	1,864	7,569
Residential Mortgages	209	64,034	105	45	64,393
Other Retail	–	9,109	609	104	9,822
Retail SME	–	4,831	–	–	4,831
Other Assets	1,429	3,223	987	1,262	6,901
Total Gross Credit Exposure	7,688	100,285	27,036	22,974	157,983

⁽¹⁾ EMEA represents Europe, United Kingdom, Middle East and Africa

⁽²⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

5.0 Credit Risk Measurement

continued

5.5 Credit Risk Distribution by Counterparty Type

The credit risk exposures by Basel III risk type (portfolio type) below have been classified based on counterparty split of the exposure.

APS 330 Table 7(d)

Portfolio Type	As at 31 March 2021				
	Financial Institution \$m	Government \$m	Corporate \$m	Retail \$m	Total \$m
Corporate	17,132	2	29,932	145	47,211
SME Corporate	872	–	5,591	935	7,398
Sovereign	14,103	1,820	2	–	15,925
Bank	7,402	–	–	–	7,402
Residential Mortgages	1,011	–	2,676	78,112	81,799
Other Retail	41	–	823	7,318	8,182
Retail SME	85	–	3,022	1,293	4,400
Other Assets	3,517	352	2,050	1	5,920
Total Gross Credit Exposure	44,163	2,174	44,096	87,804	178,237

Portfolio Type	As at 31 March 2020				
	Financial Institution \$m	Government \$m	Corporate \$m	Retail \$m	Total \$m
Corporate ⁽¹⁾	17,680	15	35,421	258	53,374
SME Corporate ⁽¹⁾⁽²⁾	723	–	4,494	671	5,888
Sovereign	2,295	2,904	6	–	5,205
Bank	7,569	–	–	–	7,569
Residential Mortgages	1,463	–	1,836	61,094	64,393
Other Retail	12	–	1,014	8,796	9,822
Retail SME	–	–	3,270	1,561	4,831
Other Assets	4,606	578	1,714	3	6,901
Total Gross Credit Exposure	34,348	3,497	47,755	72,383	157,983

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

⁽²⁾ The EAD figures have been reclassified for the Business Banking portfolio in the SME Corporate line, with balances now reflected in the Financial Institution column (moved from the Corporate column).

5.6 Credit Risk by Maturity Profile

The credit risk exposures below have been based on residual contractual maturity of the exposure.

APS 330 Table 7(e)

Portfolio Type	As at 31 March 2021			Total \$m
	≤1 year \$m	1 ≤ 5 years \$m	> 5 years \$m	
Corporate	29,523	14,435	3,253	47,211
SME Corporate	1,382	5,076	940	7,398
Sovereign	12,725	3,015	185	15,925
Bank	4,944	2,203	255	7,402
Residential Mortgages	140	300	81,359	81,799
Other Retail	1,198	6,260	724	8,182
Retail SME	312	4,045	43	4,400
Other Assets	3,562	1,088	1,270	5,920
Total Gross Credit Exposure	53,786	36,422	88,029	178,237

Portfolio Type	As at 31 March 2020			Total \$m
	≤1 year \$m	1 ≤ 5 years \$m	> 5 years \$m	
Corporate ⁽¹⁾	33,233	16,415	3,726	53,374
SME Corporate ⁽¹⁾	1,161	3,856	871	5,888
Sovereign	4,634	426	145	5,205
Bank	5,352	1,930	287	7,569
Residential Mortgages	111	244	64,038	64,393
Other Retail	1,402	7,550	870	9,822
Retail SME	251	4,525	55	4,831
Other Assets	4,807	1,352	742	6,901
Total Gross Credit Exposure	50,951	36,298	70,734	157,983

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

5.0 Credit Risk Measurement

continued

Macquarie is approved by APRA to use the Basel III Foundation Internal Ratings Based (FIRB) Approach for credit risk for its wholesale portfolios. Approval for the FIRB approach enables Macquarie to rely on its own internal estimates for some of the necessary credit risk components in determining the capital requirement for a given credit exposure. Internal estimates are used for PD and Maturity, while for wholesale exposures APRA provided estimates must be used for LGD and Exposure at Default (EAD).

A number of retail businesses have been accredited to use the Internal Ratings Based (IRB) Approach, whereby retail exposures are assigned to pools based on both borrower and transaction risk and where the PD and LGD estimates are derived from Macquarie's loss history for exposures in that pool.

Macquarie has a number of portfolios which do not have a statistically significant loss history and therefore do not qualify for the IRB approach to credit risk. Accordingly, the Standardised approach is applied to these portfolios and they are assessed periodically to determine if a change to the IRB approach can be substantiated.

Other portfolios will remain Standardised either because they are in run-off or have been approved by APRA as such. The obligors in these portfolios are not rated by any of the recognised ECAI (S&P, Moody's & Fitch) as they are primarily composed of individual borrowers or small businesses. Consequently, these exposures are risk-weighted at 100%.

A summary of the applicable IRB or Standardised treatment to the Macquarie credit portfolios is set out in the table below.

Exposure Type	Approach	Treatment
Primarily all credit exposures to Corporate (including SME Corporate), Bank and Sovereign counterparties	IRB	MQ rating is mapped to the S&P ratings scale S&P historical default data is used to estimate a PD for each rating grade
All exposures subject to Supervisory Slotting Treatment	IRB	Exposure is slotted based on a combination of its MQ rating and LGD, with APRA determined supervisory risk weights assigned to each exposure
Macquarie originated auto and equipment lease exposures in Australia	IRB	Through-the-cycle pool PDs and downturn LGDs
Macquarie originated and purchased Residential Mortgages in Australia ⁽¹⁾	IRB	Through-the-cycle pool PDs and downturn LGDs The regulatory floor of 20% applies to the LGD of the portfolio.
Other Residential Mortgages	Standardised	Risk Weighted per APS 112
Other auto and equipment lease exposures in Australia	Standardised	Risk Weighted per APS 112
Credit card exposures in Australia	Standardised	100% risk-weighted
Personal loan exposures in Australia	Standardised	100% risk-weighted
Margin loan exposures in Australia	IRB	A 20% risk-weight prescribed in APS113 Capital Adequacy: Internal Ratings-based Approach to Credit Risk is applied
Related party exposures	IRB	Risk Weighted per APS 113

⁽¹⁾ Excludes loans to self-managed superannuation funds secured by residential property and reverse mortgages, which are considered as other residential mortgages under standardised approach.

6.0 Calculation of Credit Risk Exposures

6.1 Credit Risk Exposures by Measurement Approach

The table below sets out the gross exposures by Basel III portfolio class as required by APRA under APS 330.

APS 330 Table 7(i)

Portfolio Type	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Subject to IRB approach		
Corporate ⁽¹⁾⁽²⁾	47,119	53,112
SME Corporate ⁽¹⁾⁽³⁾	7,398	5,888
Sovereign	15,925	5,205
Bank	7,402	7,569
Residential Mortgages	80,677	63,156
Other Retail	6,608	7,831
Retail SME	4,400	4,831
Total IRB approach	169,529	147,592
Subject to Standardised approach		
Corporate	92	262
Residential Mortgages	1,122	1,237
Other Retail	1,574	1,991
Total Standardised approach	2,788	3,490
Other Assets⁽⁴⁾	5,920	6,901
Total Gross Credit Exposure	178,237	157,983

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line). Comparatives as at 31 March 2020 have been restated.

⁽²⁾ Corporate includes specialised lending exposure of \$4,526 million as at 31 March 2021 (31 March 2020: \$5,156 million).

⁽³⁾ SME Corporate includes specialised lending exposure of \$2,357 million as at 31 March 2021 (31 March 2020: \$1,554 million).

⁽⁴⁾ The major components of Other Assets are related party exposures, unsettled trades and fixed assets.

6.0 Calculation of Credit Risk Exposures

continued

6.2 Credit Risk Exposures by Risk Weight

The tables below detail total credit exposures by risk weight bandings for the standardised portfolio and risk weightings for specialised lending exposures.

The disclosure of Standardised exposures below shows gross credit exposures before and after the impact of risk mitigation by collateral and guarantees.

APS 330 Table 8(b) Standardised Approach Exposures

Risk Weight	As at 31 March 2021		As at 31 March 2020	
	Total Gross Credit Exposure \$m	Exposure after mitigation by eligible collateral & guarantees \$m	Total Gross Credit Exposure \$m	Exposure after mitigation by eligible collateral & guarantees \$m
0%	4	4	–	–
> 0% ≤ 20%	–	–	–	–
> 20% ≤ 35%	50	50	59	59
> 35% ≤ 50%	574	574	675	675
> 50% ≤ 75%	451	451	483	483
> 75% ≤ 100%	1,709	1,709	2,273	2,273
> 100% ≤ 150%	–	–	–	–
> 150%	–	–	–	–
Total	2,788	2,788	3,490	3,490

IRB Approach Exposures

Specialised lending exposures subject to supervisory slotting

Risk Weight	Gross Credit Exposure	
	As at 31 March 2021 \$m	As at 31 March 2020 \$m
70%	952	1,084
90%	2,564	1,896
115%	3,179	3,523
250%	104	59
Default	85	148
Total	6,884	6,710

6.3 Credit Risk Exposures by Risk Grade

This section sets out the gross credit exposures split by PD for Non-Retail portfolios and Expected Loss (EL) for Retail portfolios.

The tables below provide a breakdown of gross credit exposures into each PD band for the Non-Retail portfolios under the Basel III FIRB classes of Corporate, SME Corporate, Sovereign and Bank as shown in Section 6.1.

APS 330 Table 9(d)

Non-Retail	As at 31 March 2021 PD Grade							Total Gross Credit Exposure \$m
	0 <= 0.03% \$m	0.03% <= 0.15% \$m	0.15% <= 1% \$m	1% <= 5% \$m	5% <= 15% \$m	15% <= 100% \$m	Default \$m	
Corporate	2,251	10,186	20,548	8,767	3,756	619	992	47,119
SME Corporate	-	-	2,130	3,511	1,397	107	253	7,398
Sovereign	15,217	664	27	15	2	-	-	15,925
Bank	491	6,451	355	105	-	-	-	7,402
Total Gross Credit Exposure	17,959	17,301	23,060	12,398	5,155	726	1,245	77,844

Non-Retail	As at 31 March 2020 PD Grade							Total Gross Credit Exposure \$m
	0 <= 0.03% \$m	0.03% <= 0.15% \$m	0.15% <= 1% \$m	1% <= 5% \$m	5% <= 15% \$m	15% <= 100% \$m	Default \$m	
Corporate ⁽¹⁾	1,932	12,476	22,977	8,886	4,580	1,255	1,006	53,112
SME Corporate ⁽¹⁾	-	-	1,721	3,422	461	62	222	5,888
Sovereign	4,304	846	27	24	4	-	-	5,205
Bank	865	6,098	521	79	5	1	-	7,569
Total Gross Credit Exposure	7,101	19,420	25,246	12,411	5,050	1,318	1,228	71,774

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

6.0 Calculation of Credit Risk Exposures

continued

6.3 Credit Risk Exposures by Risk Grade (continued)

Included within Total Gross Credit Exposures in the previous page are exposures for undrawn commitments. These undrawn commitment exposures are set out in the following tables.

APS330 Table 9(d) (continued)

Undrawn Commitments	As at 31 March 2021 PD Grade							Total Gross Credit Exposure \$m
	0 <= 0.03% \$m	0.03% <= 0.15% \$m	0.15% <= 1% \$m	1% <= 5% \$m	5% <= 15% \$m	15% <= 100% \$m	Default \$m	
Corporate	-	177	1,436	637	130	60	15	2,455
SME Corporate	-	-	402	582	147	8	8	1,147
Sovereign	12	-	-	3	-	-	-	15
Bank	-	-	4	-	-	-	-	4
Total Undrawn Commitments	12	177	1,842	1,222	277	68	23	3,621

Undrawn Commitments	As at 31 March 2020 PD Grade							Total Gross Credit Exposure \$m
	0 <= 0.03% \$m	0.03% <= 0.15% \$m	0.15% <= 1% \$m	1% <= 5% \$m	5% <= 15% \$m	15% <= 100% \$m	Default \$m	
Corporate ⁽¹⁾	-	234	1,146	444	294	32	29	2,179
SME Corporate ⁽¹⁾	-	-	280	416	18	4	11	729
Sovereign	34	-	-	4	-	-	-	38
Bank	-	-	-	-	-	-	-	-
Total Undrawn Commitments	34	234	1,426	864	312	36	40	2,946

⁽¹⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

6.3 Credit Risk Exposures by Risk Grade (continued)

The tables below provide a breakdown of gross credit exposures into each EL category for the Retail portfolios under the Basel III classes of Residential Mortgages, Other Retail and Retail SME as shown in Section 6.1.

APS330 Table 9(d) (continued)

Retail	As at 31 March 2021 Expected Loss Categories					Total Gross Credit Exposure \$m
	0 <= 0.1%	0.1% <= 0.3%	0.3% <= 3%	3% <= 10%	10% <= 100%	
	\$m	\$m	\$m	\$m	\$m	
Residential Mortgages	37,168	38,243	4,153	583	530	80,677
Other Retail	–	3,134	2,763	593	118	6,608
Retail SME	22	199	3,618	462	99	4,400
Total Gross Credit Exposure	37,190	41,576	10,534	1,638	747	91,685

Retail	As at 31 March 2020 Expected Loss Categories					Total Gross Credit Exposure \$m
	0 < =0.1%	0.1% <= 0.3%	0.3% <= 3%	3% <= 10%	10% <= 100%	
	\$m	\$m	\$m	\$m	\$m	
Residential Mortgages	26,814	31,364	3,992	527	459	63,156
Other Retail	–	3,659	3,320	715	137	7,831
Retail SME	26	184	3,786	720	115	4,831
Total Gross Credit Exposure	26,840	35,207	11,098	1,962	711	75,818

6.0 Calculation of Credit Risk Exposures continued

6.3 Credit Risk Exposures by Risk Grade (continued)

Included within Total Gross Credit Exposures in the previous page are exposures for undrawn commitments. These undrawn commitment exposures are set out in the following tables.

APS330 Table 9(d) (continued)

	As at 31 March 2021					Total \$m
	Expected Loss Categories					
Undrawn Commitments	0 < =0.1% \$m	0.1% <= 0.3% \$m	0.3% <= 3% \$m	3% <= 10% \$m	10% <= 100% \$m	
Residential Mortgages	8,137	3,517	197	37	1	11,889
Retail SME	11	-	-	-	-	11
Total Undrawn Commitments	8,148	3,517	197	37	1	11,900

	As at 31 March 2020					Total \$m
	Expected Loss Categories					
Undrawn Commitments	0 < =0.1% \$m	0.1% <= 0.3% \$m	0.3% <= 3% \$m	3% <= 10% \$m	10% <= 100% \$m	
Residential Mortgages	6,848	2,660	216	29	1	9,754
Retail SME	15	-	-	-	-	15
Total Undrawn Commitments	6,863	2,660	216	29	1	9,769

7.0 Provisioning

7.1 Impaired Facilities and Past Due

Facilities are classified as impaired when there is doubt regarding the collectability of some or all of the contractual payments due from a counterparty. The contractual payments include principal outstanding, interest and other related charges.

Exposures will be assessed for impairment where there is objective evidence of impairment. Objective evidence of impairment may include market, economic or legal factors impacting upon the ability of a counterparty to meet their repayment obligations. The assessment process consists of a comparison of the carrying value of the exposure and the present value of its estimated future cash flows (recoverable amount).

The estimation of expected future cash flows takes into consideration:

- external valuations of the asset (taking into account the value of any security held);
- costs of recovery; and
- the timeframe for realisation of recovery and/or sale of security.

The estimated future cash flows are discounted at the effective interest rate to determine the recoverable amount of the financial asset.

Facilities that are more than 90 calendar days past contractual due date can be classified as either:

- impaired facility if it meets the criteria for impairment as detailed above; or
- past due where the facility is assessed as well secured.

For the purposes of this report, past dues represent the full amount outstanding, not just the amount that is past due.

7.2 Specific Provisions and General Reserve for Credit Losses

Specific Provisions

Facilities that are assessed as impaired are subject to a recoverability test. Specific provisions are calculated as per the APRA Prudential Standard APS 220: Credit Quality (APS 220) and are generally measured as the difference between the contractual and expected cash flows from the individual exposure, discounted using the effective interest rate for that exposure.

General Reserve for Credit Losses

The General Reserve for Credit Losses (GRCL) is required under APS 220 to cover credit losses prudently estimated but not certain to arise over the full life of all individual facilities making up the credit risk portfolio.

Provisions representing 12 months expected credit loss (ECL) on performing loans (referred to as stage I provisions under AASB 9), are allocated to GRCL as they are held against future, presently unidentified losses. ECL provisions are determined based on the point-in-time probability of default (PD) over the next 12 months and the lifetime losses associated with such PD, adjusted for forward looking information.

Regulatory Specific Provisions

Lifetime ECL provisions on under-performing and non-performing loans (referred to as stage II and III provisions under AASB 9) deemed ineligible to be included in the GRCL, are considered regulatory specific provisions. Lifetime ECL provisions are determined with reference to the financial asset's lifetime PD and the lifetime losses associated with that PD, adjusted for forward looking information.

7.0 Provisioning

continued

7.3 Regulatory Expected Loss (REL)

REL represents the estimated future credit losses expected to be incurred in a portfolio. For non-defaulted exposures, REL is calculated as a function of the outstanding exposure, PD and LGD whereas REL for defaulted Corporate, Sovereign and Bank exposures under the FIRB approach is determined as the product of LGD and EAD. LGDs are defined by APRA for Corporate, Bank and Sovereign. Specialised lending exposures subject to supervisory slotting criteria are measured using APRA determined risk weightings. For defaulted retail exposures under the IRB approach, REL is based on the best estimate of loss. The excess of REL over eligible provisions is required by APRA to be deducted from Common Equity Tier 1 capital. Eligible provisions include credit related provisions, partial write-offs, and discounts on defaulted assets. As at 31 March 2021, the total REL was \$1,078 million (31 March 2020: \$1,285 million), with the excess of REL over eligible provisions resulting in a Common Equity Tier 1 deduction of \$63 million (31 March 2020: \$317 million).

7.4 Provisions by Counterparty Type

The table below details impaired facilities, past due and specific provisions.

APS 330 Table 7(f)

	As at 31 March 2021			As at 31 March 2020		
	Impaired Facilities \$m	Past Due >90 days \$m	Specific Provisions \$m	Impaired Facilities \$m	Past Due >90 days \$m	Specific Provisions \$m
Subject to IRB approach						
Corporate ⁽¹⁾	344	13	(154)	470	20	(155)
SME Corporate ⁽¹⁾	165	49	(42)	136	38	(45)
Residential Mortgages ⁽¹⁾	442	196	(6)	414	163	(7)
Other Retail ⁽¹⁾	117	–	(32)	135	–	(31)
Retail SME ⁽¹⁾	95	3	(25)	110	2	(21)
Total IRB approach	1,163	261	(259)	1,265	223	(259)
Subject to Standardised approach						
Residential Mortgages	–	–	–	–	–	–
Other Retail ⁽¹⁾	48	1	(24)	46	3	(19)
Total Standardised approach	48	1	(24)	46	3	(19)
Other Assets⁽²⁾	–	–	–	8	–	–
Total	1,211	262	(283)	1,319	226	(278)
Additional regulatory specific provisions⁽³⁾			(285)			(343)

⁽¹⁾ The impaired facilities, past due and specific provisions figures have been reclassified for a portion of the Business Banking portfolio, with balances now reflected in the Residential Mortgages, Retail SME and Other Retail lines (moved from the SME Corporate and Corporate lines). Comparatives as at 31 March 2020 have been restated.

⁽²⁾ Includes other assets acquired through security enforcement subsequent to facility foreclosure.

⁽³⁾ Includes Stage II provisions deemed ineligible for GRCL. Combined with \$76 million (31 March 2020: \$53 million) of Stage III provisions (which are not specific provisions on impaired facilities) primarily related to IRB Corporate and Retail.

APS 330 Table 9(e)

	For the 12 months to 31 March 2021		For the 12 months to 31 March 2020	
	Charges for Specific provisions \$m	Write-offs ⁽²⁾ \$m	Charges for Specific provisions \$m	Write-offs ⁽²⁾ \$m
Subject to IRB approach				
Corporate ⁽¹⁾	(110)	–	(182)	–
SME Corporate ⁽¹⁾	(24)	–	(38)	–
Residential Mortgages ⁽¹⁾	(4)	–	(5)	–
Other Retail ⁽¹⁾	(15)	–	(25)	–
Retail SME ⁽¹⁾	(35)	–	(31)	–
Total IRB approach	(188)	–	(281)	–
Subject to Standardised approach				
Other Retail	(26)	–	(33)	–
Total Standardised approach	(26)	–	(33)	–
Total	(214)	–	(314)	–

⁽¹⁾ The impaired facilities, past due and specific provisions figures have been reclassified for a portion of the Business Banking portfolio, with balances now reflected in the Residential Mortgages, Retail SME and Other Retail lines (moved from the SME Corporate and Corporate lines). Comparatives as at 31 March 2020 have been restated.

⁽²⁾ Under AASB 9, there are no longer direct write-offs to Income Statement. A financial asset is written-off when there is no reasonable expectation of recovering it. At the time of writing-off a financial asset it is adjusted against the Expected Credit Loss (ECL) provision created over the life of the asset and not directly written-off to Income Statement.

7.0 Provisioning

continued

7.5 Provisions by Geographic Region

The tables below split impaired facilities, past due and provisions by geographic region. Note that the geographic split has been based on the domicile of the counterparty.

APS 330 Table 7(g)

Geographic Region	As at 31 March 2021			
	Impaired Facilities \$m	Past due > 90 days \$m	Specific Provisions \$m	GRCL \$m
Australia	896	249	(136)	(325)
EMEA	132	12	(78)	(32)
Americas	171	1	(59)	(26)
Asia Pacific	12	–	(10)	(1)
Total	1,211	262	(283)	(384)
Additional regulatory specific provisions			(285)	

Geographic Region	As at 31 March 2020			
	Impaired Facilities \$m	Past due > 90 days \$m	Specific Provisions \$m	GRCL \$m
Australia	865	206	(131)	(130)
EMEA	115	1	(74)	(32)
Americas	263	19	(71)	(47)
Asia Pacific	76	–	(2)	–
Total	1,319	226	(278)	(209)
Additional regulatory specific provisions			(343)	

7.6 General Reserve for Credit Losses

APS 330 Table 7(j)

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
General reserve for credit losses before tax	384	209
Tax effect	(96)	(49)
General reserve for credit losses	288	160

7.7 Movement in Provisions

The table below shows the movement of provisions over the 12 months to 31 March 2021.

APS 330 Table 7(h)

	GRCL \$m	Specific Provisions and Additional Specific provision \$m	Total \$m
Provisions as at 31 March 2020	209	621	830
Charges (net of reversals) during the period	155	124	279
Assets written off or sold, previously provided for	–	(117)	(117)
Net transfer (to)/from other provisions	30	(30)	–
Adjustments for foreign exchange fluctuations	(10)	(30)	(40)
Provisions as at 31 March 2021	384	568	952

7.8 Analysis of Expected Credit Model Performance versus Actual Results

The table below relates only to Macquarie's portfolios measured under the IRB approach and compares actual results to the average estimate over the January 2008 to March 2021 period.

APS 330 Table 9(f)

Portfolio Type	PD		Exposure at default	LGD	
	Estimated %	Actual %	Estimate to Actual Ratio	Estimated %	Actual %
Corporate	1.91%	0.97%	N/A ⁽¹⁾	N/A ⁽¹⁾	N/A ⁽¹⁾
SME Corporate	2.49%	2.95%	N/A ⁽¹⁾	N/A ⁽¹⁾	N/A ⁽¹⁾
Sovereign	0.15%	0.00%	N/A ⁽¹⁾	N/A ⁽¹⁾	N/A ⁽¹⁾
Bank	0.14%	0.00%	N/A ⁽¹⁾	N/A ⁽¹⁾	N/A ⁽¹⁾
Residential Mortgages ⁽²⁾	1.14%	1.04%	101%	20.15%	3.48%
Other Retail ⁽²⁾	1.90%	1.94%	111%	47.10%	24.96%

⁽¹⁾ Macquarie is accredited under the Foundation Internal Ratings Based Approach (FIRB). As the LGD and EAD assumptions under FIRB are set by APRA for these portfolio types, disclosure of actual against estimates does not facilitate meaningful assessment of the performance of internal rating processes for these portfolios.

⁽²⁾ Includes exposures disclosed as Retail SME.

7.0 Provisioning

continued

In accordance with APS 220 Attachment E, Macquarie has applied the regulatory capital approach specified to those loans where the COVID-19 repayment deferral was granted.

Loans subject to COVID-19 payment pause as at 31 March 2021:

COVID-19 Payment Pause	Loan Count	Exposure \$m
Personal Banking (Home Loans and Credit Cards)	162	79
Vehicle and Asset Finance (inc. Wholesale)	3,620	156
Business Banking	-	-

Loans subject to COVID-19 payment pause as at 31 December 2020:

COVID-19 Payment Pause	Loan Count	Exposure \$m
Personal Banking (Home Loans and Credit Cards)	1,677	861
Vehicle and Asset Finance (inc. Wholesale)	9,639	399
Business Banking	75	41

8.0 Credit Risk Mitigation

8.1 Netting

Netting arises where a single legal obligation is created covering all transactions included in a netting agreement. The most common form of netting which Macquarie applies for these purposes is close-out netting.

Netting is applied to a counterparty balance only when appropriate documentation governing transactions between the Macquarie entity and the counterparty has been entered into, Legal Risk Management has confirmed that it is legally effective to net with that counterparty, and APRA Prudential Standard APS 112 Capital Adequacy: Standardised Approach to Credit Risk (APS 112), has been complied with.

8.1.1 Collateral Valuation and Management

RMG Credit limits are set and the related exposures are calculated before taking any non-cash collateral into consideration other than for securities finance transactions where liquid financial instruments are an inherent part of the lending arrangement. Typically, collateral is required for all but short-dated, vanilla trading activity.

A wide variety of collateral can be accepted depending on the counterparty and the nature of the exposure. Some of the most common forms are charges over:

- cash or gold deposits;
- debt or equity securities;
- company assets; and
- commercial or residential property.

Guarantees are frequently requested from banks, parent or associated companies. Relative ratings between the obligor and guarantor are monitored as part of the regulatory capital calculation process as mitigation will normally cease to be eligible if the rating of the guarantor falls below that of the underlying obligor. Collateral taken in the form of tradeable securities is revalued daily by the same application systems which are used to trade those particular products. Credit default swaps are not a common form of credit risk mitigation. Macquarie policies require that all security is taken in conjunction with a formal written agreement which gives Macquarie direct and unconditional rights over the collateral in the event of default by the obligor.

To mitigate credit risk Macquarie makes frequent use of margining arrangements. In these cases, counterparties post collateral daily in the form of cash or liquid securities to cover outstanding trading positions. Macquarie also engages in reciprocal margining agreements with counterparties under ISDA or similar agreements where the Credit Support Annex can contain provisions whereby margining thresholds may vary in relation to the credit ratings of the respective parties. Macquarie is compliant with OTC Margin reforms in all legal jurisdictions with respect to thresholds, minimum transfer amounts and rounding for affected counterparties in those jurisdictions. Collateral and funding requirements due to credit ratings downgrade(s) are incorporated into Macquarie's liquidity stress scenarios, which consider liquidity obligations for a twelve month period under both a systemic and combined name and systemic crisis scenario. These scenarios are embedded in the MGL and MBL Liquidity Policies, alongside Macquarie's liquidity risk appetite. The increase in collateral requirements is included as an outflow in these scenarios,

explicitly ensuring that Macquarie has sufficient funding coverage in these events.

Specific protocols surround the acceptance of real estate as collateral

Prior to acceptance, any independent valuation must undergo a formal review process by which it is assessed for quality and adherence to policy and standing instructions. The escalation of this review and acceptance process will depend on:

- the type of property being valued;
- the dollar value of the property being valued; and
- the proposed loan-to-value ratio (LVR).

The value of all real estate collateral is assessed regularly and is re-valued where appropriate, be it on an asset specific basis or a market assessment across a pool of assets, such as residential mortgages. The interval between re-valuation is contingent on the type of property, extent of the property's encumbrance, the LVR at origination and the market conditions that have prevailed since the valuation was conducted and counterparty performance. All prior claims on the property collateral are recorded and taken into consideration when calculating the available security value.

All details regarding security together with netting/margining rules are recorded in collateral management systems which support the operational control framework.

8.1.2 Wrong Way Risk

Specific wrong-way risk occurs when exposure to the counterparty is positively correlated with the counterparty's probability of default. RMG Credit runs a monthly monitoring process to ensure that all instances of specific wrong-way risk are identified and appropriately escalated. General wrong-way risk occurs when the probabilities of counterparty defaults are positively correlated with market risk factor movements. Macquarie considers these correlations as part of the credit assessment process and has daily reports which identify asset sensitivities across a range of dimensions including industry/peer group, counterparty and rating grade.

8.0 Credit Risk Mitigation

continued

8.2 Exposures Mitigated by Eligible Collateral

Eligible financial collateral is defined in APS 112 as cash, certificates of deposit, bank bills, certain rated debt issues and listed equities. Other items that are eligible for recognition as collateral include mortgages over commercial or residential real estate (subject to the satisfaction of certain requirement listed in APS113).

As noted, Macquarie takes a wide range of collateral of which only a portion is eligible under APS 112. All collateral is recorded in appropriate systems with clear definition by type and eligibility status. Ineligible collateral under APRA standards is excluded from the capital calculation process.

Some types of collateral which are eligible by definition may be determined to be ineligible or adjusted with an appropriate haircut at the time of calculation due to mismatches of maturity or currency between the collateral and the underlying exposures.

For capital adequacy purposes, eligible cash collateral is considered in calculating the capital requirement. For non-cash collateral, a regulatory haircut is applied to both the gross credit exposure and the value of the collateral, and these adjusted amounts are used as the basis of calculating the capital requirement.

The tables below show gross credit exposures by Basel III portfolio under the IRB approach and the amount of risk exposure which is mitigated by APRA defined eligible collateral, guarantees or credit derivatives.

APS 330 Table 10(b) & (c)

Measurement Approach	As at 31 March 2021			
	Total Gross Credit Exposure ⁽¹⁾ \$m	Eligible Financial Collateral \$m	Other Eligible Collateral \$m	Exposures Covered by Guarantees \$m
Subject to IRB approach				
Corporate	47,119	594	53	2,886
SME Corporate	7,398	86	1,280	–
Sovereign	15,925	–	–	–
Bank	7,402	–	–	–
Residential Mortgages	80,677	–	–	–
Other Retail	6,608	–	–	–
Retail SME	4,400	–	–	–
Total IRB approach	169,529	680	1,333	2,886

⁽¹⁾ Per APS 180, the impact of eligible collateral for market related contracts is embedded in the calculation of total gross credit exposure and is not separately reported as eligible financial collateral.

Measurement Approach	As at 31 March 2020			
	Total Gross Credit Exposure ⁽¹⁾ \$m	Eligible Financial Collateral \$m	Other Eligible Collateral \$m	Exposures Covered by Guarantees \$m
Subject to IRB approach				
Corporate ⁽²⁾	53,112	747	63	2,724
SME Corporate ⁽²⁾	5,888	75	913	–
Sovereign	5,205	–	–	–
Bank	7,569	–	–	36
Residential Mortgages	63,156	–	–	–
Other Retail	7,831	–	–	–
Retail SME	4,831	–	–	–
Total IRB approach	147,592	822	976	2,760

⁽¹⁾ Per APS 180, the impact of eligible collateral for market related contracts is embedded in the calculation of total gross credit exposure and is not separately reported as eligible financial collateral.

⁽²⁾ The EAD figures have been reclassified for the Business Banking portfolio, with balances now reflected in the SME Corporate line (moved from the Corporate line).

8.3 Counterparty Credit risk

Counterparty Credit Risk (CCR) is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows. An economic loss would occur if the transactions or portfolio of transactions with the counterparty has a positive economic value for any MGL Group entity at the time of default. Unlike exposure to credit risk through a loan, where the exposure to credit risk is unilateral and only the lending bank faces the risk of loss, CCR creates a bilateral risk of loss whereby the market value for many different types of transactions can be positive or negative to either counterparty. The market value is uncertain and can vary over time with the movement of underlying market factors.

Regulatory capital is allocated to CCR exposures using the SA-CCR calculation, which reflects expected exposure to the counterparty and its risk-rating. Economic capital also reflects correlations and diversification impacts across risk types.

As at 31 March 2021, a unilateral one-notch and two-notch downgrade in the MBL's rating would have resulted in a further \$226 million and \$153 million (credit rating downgrade postings are cumulative) of collateral being posted to other counterparties respectively. Collateral stress tests are also conducted on the MBL's counterparties so that it can monitor for likely collateral stresses in the event of a counterparty downgrade.

APS 330 Table 11(b)

	As at 31 March 2021 \$m	As at 31 March 2020 ⁽¹⁾ \$m
Exposure at default for counterparty exposures		
Replacement cost excluding collateral	12,947	19,558
Replacement cost with eligible collateral (A)	6,282	10,628
Potential future exposure (PFE) (B)	11,242	9,787
Exposure at default [(A+B) * 1.4]	24,533	28,581
Comprising of:		
Interest rate	1,287	1,589
Credit	194	196
Equity	1,536	1,356
Foreign exchange	5,510	4,934
Commodity	16,006	20,506
Exposure at default	24,533	28,581

⁽¹⁾ EAD split by product type has been restated for March 2020 in line with ARF118.0 and ARF180.0 disclosures.

APS 330 Table 11(c)

	As at 31 March 2021		As at 31 March 2020	
	Protection Bought \$m	Protection Sold \$m	Protection Bought \$m	Protection Sold \$m
Notional amount of credit derivatives				
Own credit portfolio	2,494	1,141	1,953	1,862
Client intermediation activities	-	-	-	-
Total	2,494	1,141	1,953	1,862
Credit default swaps (CDS)	2,480	1,135	1,953	1,847
Total return swaps	14	6	-	15
Total	2,494	1,141	1,953	1,862

9.0 Securitisation

9.1 Overview

A securitisation is defined as “a financing structure where the cash flow from a pool is used to make payments on obligations to at least two tranches or classes of creditors (typically holders of debt securities), with each tranche or class entitled to receive payments from the pool before or after another class of creditors, thereby reflecting different levels of credit risk.”

Macquarie engages in a range of activities in the securitisation market, including playing the following roles:

- Originator, Arranger, Manager and Servicer on Macquarie mortgage and auto and equipment finance securitisation programs;
- Lead Manager on Macquarie originated and third party securitisations;
- Swap Counterparty to Macquarie originated and third party securitisations;
- Warehouse facility provider to several third-party originators;
- Liquidity facility provider to several third-party originators and provider of redraw facilities to all Macquarie Mortgage SPVs; and
- Investor in third-party securitisation transactions.

Macquarie has also established contingent liquidity securitisation SPVs that issue and hold Residential Mortgage Backed Securities (RMBS) eligible for repurchase with the RBA.

Macquarie may, as sponsor, use the following types of special purpose vehicles to securitise third-party exposures:

- trusts, and
- special purpose companies,

issuing RMBS or asset-backed securities (ABS).

Following are the affiliated entities which the MGL group manages or advises and which can invest either in the securitisation exposures that Macquarie has securitised or in SPVs for whom Macquarie is a sponsor (i.e. manager, adviser, dealer or liquidity and/or credit enhancement provider):

- Macquarie Australian Diversified Income (High Grade) Fund
- Macquarie Australian Diversified Income Fund
- Macquarie Core Australian Fixed Interest Fund
- Macquarie Debt Market Opportunity Fund
- Macquarie Dynamic Bond Fund
- Macquarie Enhanced Australian Fixed Interest Fund
- Macquarie Fund Solutions – Macquarie Global Income Opportunities Fund
- Macquarie Global Income Opportunities Fund
- Macquarie Global Multi-Sector Fixed Income Fund
- Macquarie Income Opportunities Fund
- Macquarie Multi-Asset Opportunities Fund
- Macquarie True Index Cash Fund
- Macquarie True Index Global Bond Fund
- Macquarie True Index Sovereign Bond Fund

Any investments by these entities (if any) in securitisation exposures that Macquarie has securitised or sponsored does not form a majority of their investment portfolios and their investment represents a small percentage of the relevant securitisation issue.

9.1.1 Securitisation Risk Management

RMG is responsible for overseeing the management of the risk arising from all securitisation exposures. RMG approves all securitisation transactions and exposures arising from securitisation activity.

RMG Regulatory Affairs and Aggregate Risk Division (RAAR) reviews transactions where Macquarie acts as originator, manager or sponsor to ensure compliance with APS 120 and other regulations. RMG Credit sets limits on securitisation exposures and reviews transactions to identify all risks involved. RMG Market Risk reviews market exposures associated with securitisations, such as swaps, and other exposures held in the trading book. Macquarie's primary risk mitigant is the limit framework and approval process governing exposures to securitisations.

In addition to credit risk, securitised assets can be subject to liquidity risk, interest rate risk, and in some instances FX risk. The nature and scale of these risks varies from transaction to transaction. All securitised assets are subject to a degree of operational risk associated with documentation and the collection of cashflows.

Securitisation exposures are measured daily and monitored by RMG. RMG completes an annual review of all securitisation exposures and limits. Regulatory capital is calculated on all securitisation exposures using the available approaches in APS 116 and APS 120.

Macquarie applies the following approaches to the calculation of regulatory capital for securitisation exposures under APS 120:

- the External Ratings Based approach (ERBA); or
- the Supervisory Formula Approach (SFA).

If one of the above approaches does not apply to an exposure, then the exposure will be deducted from Common Equity Tier 1 Capital (CET1).

S&P, Moody's and Fitch Ratings have all been used to rate Macquarie securitisations.

Mitigation of credit risk on securitisation exposures is performed in accordance with Macquarie's overall credit risk mitigation policy. Details of the policy can be found in Section 8.0 of this disclosure.

9.1.2 Accounting for Securitisation

Securitisation transactions undertaken by Macquarie are accounted for in accordance with Australian Accounting Standards. As noted, securitised positions are managed in a number of SPVs.

Where these SPVs are deconsolidated for regulatory purposes under APS 120, they still need to be assessed under Australian Accounting Standards to determine whether these SPVs should be considered part of the accounting consolidated group.

Control exists when the parent is exposed, or has rights, to variable returns from its involvement with an entity and has the ability to affect those returns through its power over that entity. In Macquarie's case, it has been determined that under Australian Accounting Standards, Macquarie consolidates Macquarie mortgage SPVs and auto and equipment finance SPVs. The assets and liabilities in these SPVs detailed in the tables within this section are consolidated into the Macquarie accounting consolidated group on the basis Macquarie controls those SPVs.

Banking book securitised assets consolidated by Macquarie are held on the balance sheet at amortised cost. Securitised exposures in the trading book are held at fair value. There has been no material change to the methods of valuation from the prior period.

If there are circumstances where Macquarie is required to provide financial support for securitised assets, a relevant liability is recognised on the Bank's balance sheet. Where a liability does not currently exist but could arise in the future as a result of uncertain events not wholly within Macquarie's control, a contingent liability is disclosed to the extent such an obligation may, but probably will not, require an outflow of resources. A contingent liability does not give rise to an actual liability being recognised on the Bank's balance sheet.

Further information on accounting policies as they relate to securitisation exposures, including key assumptions and inputs to valuation processes and Macquarie's policies on accounting consolidation, can be found in the Macquarie Bank Limited financial report.

9.0 Securitisation

continued

9.2 Securitisation Exposures

9.2.1 Originating ADI Securitisation Exposures

The table below sets out the assets originated or sponsored by Macquarie where the exposures have subsequently been securitised.

Macquarie has not undertaken any synthetic securitisation in the banking and trading book.

APS 330 Table 12(g) and (o)

Exposure Type	As at 31 March 2021		
	Total outstanding exposures securitised		
	ADI originated assets ⁽¹⁾ \$m	ADI as sponsor ⁽²⁾ \$m	Other \$m
Banking Book			
Residential Mortgages	47,750	86	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	3,005	-	-
Total Banking Book	50,755	86	-
Trading Book			
Residential Mortgages	-	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	-	-	-
Other	-	-	-
Total Trading Book	-	-	-
Total	50,755	86	-

⁽¹⁾ Included in the above are assets of \$50,755 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽²⁾ Included in the above are exposures held in third party warehouse funding facilities.

Exposure Type	As at 31 March 2020		
	Total outstanding exposures securitised		
	ADI originated assets ⁽¹⁾ \$m	ADI as sponsor ⁽²⁾ \$m	Other \$m
Banking Book			
Residential Mortgages	34,790	112	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	5,369	-	-
Total Banking Book	40,159	112	-
Trading Book			
Residential Mortgages	-	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	-	-	-
Other	-	-	-
Total Trading Book	-	-	-
Total	40,159	112	-

⁽¹⁾ Included in the above are assets of \$40,159 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽²⁾ Included in the above are exposures held in third party warehouse funding facilities.

9.2.2 Performance of Assets Securitised

The assets below have been originated and securitised by Macquarie. The table below identifies the total exposures and impairment of these assets.

APS 330 Table 12(h)

As at 31 March 2021				
Total outstanding exposures securitised				
Exposure Type	Total outstanding exposures ⁽¹⁾ \$m	Impaired ⁽²⁾ \$m	Past due ⁽³⁾ \$m	ADI recognised loss from exposures securitised \$m
Residential Mortgages	47,750	259	110	–
Credit cards and other personal loans	–	–	–	–
Auto and equipment finance	3,005	45	–	–
Total	50,755	304	110	–

⁽¹⁾ Included in the above are assets of \$50,755 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽²⁾ Included in the above are impaired facilities of \$304 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽³⁾ Included in the above are past due >90 days facilities of \$110 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

As at 31 March 2020				
Total outstanding exposures securitised				
Exposure Type	Total outstanding exposures ⁽¹⁾ \$m	Impaired ⁽²⁾ \$m	Past due ⁽³⁾ \$m	ADI recognised loss from exposures securitised \$m
Residential Mortgages	34,790	264	98	–
Credit cards and other personal loans	–	–	–	–
Auto and equipment finance	5,369	104	–	–
Total	40,159	368	98	–

⁽¹⁾ Included in the above are assets of \$40,159 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽²⁾ Included in the above are impaired facilities of \$368 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

⁽³⁾ Included in the above are past due >90 days facilities of \$98 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in the Level 2 regulatory group.

9.0 Securitisation

continued

9.2.3 Summary of Outstanding Exposures Intended to be Securitised

APS 330 Table 12(i) and (p)

Macquarie may securitise assets depending on a variety of factors, including market conditions and business requirements. The table below sets out identified assets as at the reporting date which are intended to be put into securitisation deals.

Exposure Type	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Banking Book		
Residential Mortgages ⁽¹⁾	300	–
Credit cards and other personal loans	–	–
Auto and equipment finance	–	–
Total Banking Book	300	–
Trading Book		
Residential Mortgages	–	–
Credit cards and other personal loans	–	–
Auto and equipment finance	–	–
Total Trading Book	–	–

⁽¹⁾ This exposure is intended for funding only securitisation.

9.2.4 Securitisation Activity

Over the 12 months to 31 March 2021, Macquarie has undertaken the following securitisation activity. Macquarie may or may not retain an exposure to securitisation SPVs to which Macquarie has sold assets.

APS 330 Table 12(j) and (q)

Exposure Type	For the 12 months to 31 March 2021		Recognised gain or loss on sale \$m
	Value of loans sold or originated into securitisation		
	ADI originated \$m	ADI as sponsor \$m	
Banking Book			
Residential Mortgages ⁽¹⁾	21,385	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance ⁽¹⁾	1,885	-	-
Other	-	-	-
Total Banking Book	23,270	-	-
Trading Book			
Residential Mortgages	-	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	-	-	-
Total Trading Book	-	-	-

⁽¹⁾ Exposures that have been transferred between different structures, may also have been originated within the same period, which would result in those exposures being included twice.

Exposure Type	For the 12 months to 31 March 2020		Recognised gain or loss on sale \$m
	Value of loans sold or originated into securitisation		
	ADI originated \$m	ADI as sponsor \$m	
Banking Book			
Residential Mortgages ⁽¹⁾	26,662	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance ⁽¹⁾	2,506	-	-
Other	-	-	-
Total Banking Book	29,168	-	-
Trading Book			
Residential Mortgages	-	-	-
Credit cards and other personal loans	-	-	-
Auto and equipment finance	-	-	-
Total Trading Book	-	-	-

⁽¹⁾ Exposures that have been transferred between different structures, may also have been originated within the same period, which would result in those exposures being included twice.

9.0 Securitisation

continued

Originating ADI Securitisation Exposures

APS 330 Table 12(r) – Trading Book

Exposure Type	As at 31 March 2021			
	Total outstanding exposures securitised			
	Standard Approach		IMA Approach	
	Traditional \$m	Synthetic \$m	Traditional \$m	Synthetic \$m
Residential Mortgages	-	-	-	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	-	-
Other	-	-	-	-
Total	-	-	-	-

Exposure Type	As at 31 March 2020			
	Total outstanding exposures securitised			
	Standard Approach		IMA Approach	
	Traditional \$m	Synthetic \$m	Traditional \$m	Synthetic \$m
Residential Mortgages	-	-	-	-
Credit cards and other personal loans	-	-	-	-
Auto and equipment finance	-	-	-	-
Other	-	-	-	-
Total	-	-	-	-

9.3

9.3.1 Exposures Arising from Securitisation Activity by Asset Type

This table sets out the on and off balance sheet securitisation exposures originated or purchased, broken down by asset type.

APS 330 Table 12(k) and (s)

Exposure Type	As at 31 March 2021		
	Total outstanding exposures securitised ⁽¹⁾		
	On balance sheet \$m	Off balance sheet \$m	Total exposures \$m
Banking Book			
Residential Mortgages	49,814	–	49,814
Credit cards and other personal loans ⁽²⁾	190	–	190
Auto and equipment finance	3,217	187	3,404
Other	229	109	338
Total Banking Book	53,450	296	53,746
Trading Book			
Residential Mortgages	–	–	–
Credit cards and other personal loans	–	–	–
Auto and equipment finance	–	–	–
Other	–	–	–
Total Trading Book	–	–	–

⁽¹⁾ Included in the above are assets of \$50,755 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in Level 2 regulatory group.

⁽²⁾ Relates to invested securitisation positions.

Exposure Type	As at 31 March 2020		
	Total outstanding exposures securitised ⁽¹⁾		
	On balance sheet \$m	Off balance sheet \$m	Total exposures \$m
Banking Book			
Residential Mortgages	36,984	–	36,984
Credit cards and other personal loans ⁽²⁾	487	–	487
Auto and equipment finance	5,482	2	5,484
Other	448	151	599
Total Banking Book	43,401	153	43,554
Trading Book			
Residential Mortgages	–	–	–
Credit cards and other personal loans	–	–	–
Auto and equipment finance	–	–	–
Other	–	–	–
Total Trading Book	–	–	–

⁽¹⁾ Included in the above are assets of \$40,159 million in securitisation entities where Macquarie continues to hold capital behind the underlying pool of securitised assets in Level 2 regulatory group.

⁽²⁾ Relates to invested securitisation positions.

9.0 Securitisation

continued

9.3.2 Exposure by Risk Weight Band

Banking Book

APS 330 Table 12(l)

Risk weight band	As at 31 March 2021		As at 31 March 2020	
	Securitisation exposures subject to ERBA			
	Gross Credit Exposure \$m	Risk Weighted Assets \$m	Gross Credit Exposure \$m	Risk Weighted Assets \$m
=<20%	2,026	403	2,548	509
>20%–50%	48	17	69	28
>50%–100%	14	10	17	12
>100%–140%	–	–	90	94
Total	2,088	430	2,724	643

Risk weight band	As at 31 March 2021		As at 31 March 2020	
	Securitisation exposures subject to SFA			
	Gross Credit Exposure \$m	Risk Weighted Assets \$m	Gross Credit Exposure \$m	Risk Weighted Assets \$m
=<20%	409	65	544	82
>20%–50%	181	72	105	33
>50%–100%	180	111	–	–
>100%–150%	1	1	–	–
>150%–650%	–	–	–	–
>650%–<1250%	–	–	–	–
Total	771	249	649	115

Risk weight band	As at 31 March 2021		As at 31 March 2020	
	Securitisation exposures subject to risk-weight cap			
	Gross Credit Exposure \$m	Risk Weighted Assets \$m	Gross Credit Exposure \$m	Risk Weighted Assets \$m
=<20%	–	–	–	–
>20%–50%	–	–	–	–
>50%–100%	109	81	–	–
>100%–150%	–	–	–	–
>150%–650%	–	–	–	–
>650%–<1250%	–	–	–	–
Total	109	81	–	–

Exposure Type	As at 31 March 2021	As at 31 March 2020
	CET1 Deduction ⁽¹⁾	
	\$m	\$m
Residential Mortgages	2	1
Credit cards and other personal loans	-	-
Auto and equipment finance	1	1
Other	22	21
Total	25	23

⁽¹⁾ Includes Resecuritisation Exposures \$1 million as at 31 March 2021 (31 March 2020: \$1 million).

9.0 Securitisation continued

Trading Book

APS 330 Table 12(t) & (u)

Risk weight band	As at 31 March 2021		As at 31 March 2020	
	Securitisation exposure subject to Standard Approach			
	Gross Credit Exposure \$m	Risk Weighted Assets \$m	Gross Credit Exposure \$m	Risk Weighted Assets \$m
=< 20%	-	-	-	-
>20%-50%	-	-	-	-
>50%-100%	-	-	-	-
>100%-140%	-	-	-	-
Total	-	-	-	-

Risk weight band	As at 31 March 2021		As at 31 March 2020	
	Securitisation exposure subject to IMA Approach			
	Gross Credit Exposure \$m	Risk Weighted Assets \$m	Gross Credit Exposure \$m	Risk Weighted Assets \$m
=< 20%	-	-	-	-
>20%-50%	-	-	-	-
>50%-100%	-	-	-	-
>100%-150%	-	-	-	-
>150%-650%	-	-	-	-
>650%-<1250%	-	-	-	-
Total	-	-	-	-

Exposure Type	As at 31 March 2021	As at 31 March 2020
	CET1 Deduction	
	\$m	\$m
Residential Mortgages	-	-
Credit cards and other personal loans	-	-
Auto and equipment finance	-	-
Other	-	-
Total	-	-

9.3.3 Resecuritisation Exposure

APS 330 Table 12(n) and (w)

Exposure Type	As at	As at
	31 March 2021	31 March 2020
	Gross Credit Exposure ⁽¹⁾	
	\$m	\$m
Banking book		
Exposures with Credit Risk Mitigation	-	-
Exposures without Credit Risk Mitigation	1	1
Exposure to Guarantors by ratings:	-	-
Total banking book	1	1
Trading book		
Exposures with Credit Risk Mitigation	-	-
Exposures without Credit Risk Mitigation	-	-
Exposures to Guarantors by ratings:	-	-
Total trading book	-	-

⁽¹⁾ Exposures deducted from CET1 capital.

10.0 Credit Valuation Adjustment

10.1 Credit Valuation Adjustment

Under Basel III, and in accordance with APS 180 Capital Adequacy: Counterparty Credit risk ADI's are subject to a capital charge for potential mark-to-market losses on OTC derivatives (i.e. credit valuation adjustments) associated with a deterioration in the credit worthiness of a counterparty. APS 180 also allows an ADI to include eligible CVA hedges in the calculation of the CVA risk capital charge.

The CVA RWA is shown in the table below.

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
CVA capital		
Total CVA RWA	3,931	7,635

11.0 Exposure to Central Counterparties

11.1 Exposures to Central Counterparties

Under Basel III, and in accordance with APS 180 Capital Adequacy: Counterparty Credit Risk ADI's are required to hold capital against exposures arising from trades cleared by central counterparties. This includes outstanding trade exposures (excluding bilateral trades), collateral placed with the clearing house (excluding collateral placed in bankruptcy remote manner), and default fund contributions.

The RWA on exposures arising from cleared trades as at 31 March 2021 is \$736 million (31 March 2020 is \$835 million). Details of the components of these exposures are shown in the tables below.

	As at 31 March 2021		
Central counterparty trade exposure	Trade Exposure \$m	Prefunded Default Fund Contribution \$m	RWA \$m
Exposures to qualifying central counterparty	6,590	547	724
Exposures to non-qualifying central counterparty	12	–	12
Total central counterparty exposures	6,602	547	736

	As at 31 March 2020		
Central counterparty trade exposure	Trade Exposure \$m	Prefunded Default Fund Contribution \$m	RWA \$m
Exposures to qualifying central counterparty	7,320	452	816
Exposures to non-qualifying central counterparty	19	–	19
Total central counterparty exposures	7,339	452	835

12.0 Market Risk

12.1 Market Risk

Market risk is the risk of adverse changes in the value of Macquarie's trading positions as a result of changes in market conditions. Macquarie is exposed to the following risks:

- **Price:** The risk of loss due to changes in price of a risk factor (Interest rates, foreign exchange, commodities etc.)
- **Volatility:** The risk of loss due to changes in the volatility of a risk factor
- **Basis:** Risk of imperfect correlation between offsetting investments in a hedging strategy
- **Correlation:** Risk that the actual correlation between two assets or variables is different from the assumed correlation
- **Illiquid market:** Risk of inability to sell assets or close out positions in thinly-traded markets at close to the last market prices
- **Concentration:** Risk of over concentration of trading exposures in certain markets and products
- **Valuation adjustments (XVA):** Risk of valuation adjustments to derivative positions; specifically, Credit Valuation Adjustment (CVA), Debit Valuation Adjustment (DVA) and Funding Valuation Adjustment (FVA)

Macquarie has long favoured transparent scenario analysis over complex statistical modelling as the cornerstone of risk measurement.

12.1.1 Traded Market Risk

All trading activities contain calculated elements of risk taking. Macquarie is prepared to accept such risks provided they are within agreed limits, independently and correctly identified, calculated and monitored by RMG and reported to senior management on a regular basis.

RMG monitors positions within Macquarie according to a limit structure that sets limits for all exposures in all markets. Limits are applied at a granular level to individual trading desks, through increasing levels of aggregation to Divisions and Operating Groups, and ultimately, Macquarie. This approach removes the need for future correlations or scenarios to be precisely predicted as all risks are stressed to the extreme and accounted for within the risk profile agreed for each business and Macquarie in aggregate.

Limits are approved by senior management with appropriate authority for the size and nature of the risk and Macquarie adheres to a strict 'no limit, no dealing' policy. If a product or position has not been authorised and given a limit structure by RMG, then it cannot be traded. Material breaches of the approved limit structure are communicated monthly to the Macquarie and Macquarie Bank Boards.

RMG sets three complementary limit structures:

- **Contingent loss limits:** Worst case scenarios that shock prices and volatilities by more than has occurred historically. Multiple scenarios are set for each market to capture the non-linearity and complexity of exposures arising from derivatives. A wide range of assumptions about the correlations between markets is applied
- **Position limits:** Volume, maturity and open position limits are set on a large number of market instruments and securities in order to constrain concentration risk and to avoid the accumulation of risky, illiquid positions
- **Value-at-Risk (VaR) limits:** Statistical measure based on a 10-day holding period and a 99% confidence level, as stipulated by the APRA capital adequacy standard. The model is validated daily by back testing a one-day VaR against hypothetical and actual daily trading profit or loss.

The risk of loss from incorrect or inappropriate pricing and hedging models is mitigated by the requirement for all new pricing models to be independently tested by the specialists within Model Risk and Quant Analytics ('MRQA') within RMG.

12.1.2 Aggregate Measures of Market Risk

Traded market risk

Aggregate traded market risk is constrained by two risk measures, Value at Risk (VaR) and the Macro-Economic Linkages (MEL) stress scenarios. The VaR model predicts the maximum likely loss in Macquarie's trading portfolio due to adverse movements in global markets over holding periods of one and ten days. The MEL scenario uses the contingent loss approach to capture simultaneous, worst case movements across all major markets. Whereas MEL focuses on extreme price movements, VaR focuses on unexceptional changes in price so that it does not account for losses that could occur beyond the 99% level of confidence. Stress testing therefore remains the predominant focus of RMG as it is considered to be the most effective mechanism to reduce Macquarie's exposure to unexpected market events.

Interest rate risk in the banking book (IRRBB)

Aggregate IRRBB is constrained by two measures, Economic Value Sensitivity (EVS) and Earnings at Risk (EaR). The EVS metric measures the change in net present value of the banking book as a result of changes in interest rates. The EaR model constrains the impact on reported income for a change in interest rates, including the Net Interest Income for accrual portfolios.

12.1.3 Value at Risk Model

VaR provides a statistically based summary of overall market risk in the Group. The VaR model uses a Monte Carlo simulation to generate normally distributed price and volatility paths for approximately 6,300 benchmarks, using volatilities and correlations based on three years of historical data. Emphasis is placed on more recent market movements to more accurately reflect current conditions. Each benchmark represents an asset at a specific maturity, for example, one year crude oil futures or spot gold. The benchmarks provide a high level of granularity in assessing risk, covering a range of points on yield curves and forward price curves, and distinguishing between similar but distinct assets; for example crude oil as opposed to heating oil, or gas traded at different locations. Exposures to individual equities within a national market are captured by specific risk modelling incorporated directly into the VaR model.

The integrity of the VaR model is tested against daily hypothetical and actual trading outcomes (profit and loss) and reported to APRA quarterly.

12.1.4 Macro Economic Linkage Model

MEL scenarios are large, simultaneous, 'worst case' movements in global markets. The MEL scenarios consider very large movements in a number of markets at once, based on Macquarie's understanding of the economic linkages between markets. The MEL scenarios reflect a market 'shock' or 'gap' as opposed to a sustained deterioration.

12.0 Market Risk

continued

12.2 Market Risk Capital Requirement

APRA has approved the use of Macquarie's internal model to calculate regulatory capital for market risk under APS116.

The internal model calculation is based upon:

- Value at Risk using a 10 day time horizon at a 99% confidence level.
- Stressed Value at Risk using a 10 day time horizon at a 99% confidence level.
- Regulatory capital for debt security specific risk is calculated using the APRA standard method (see Section 12.2.3).

The sum of the VaR and debt security specific risk amounts is scaled by 12.5 in accordance with APRA policy to arrive at the traded market risk RWA, which was \$ 5,660 million as at 31 March 2021 (31 March 2020: \$3,971 million).

There were no hypothetical and 1 actual trading loss that exceeded the 1-day 99% VaR calculated for the 12 months ended 31 March 2021. The observed number of back-testing exceptions indicates continued acceptable operation of the VaR model.

12.2.1 Value at Risk Figures (10-day 99%)

APS 330 Table 14(f)

	For the 12 months to 31 March 2021				For the 12 months to 31 March 2020			
	VaR over the current reporting period				VaR over the previous reporting period			
	Mean value \$m	Max value \$m	Min value \$m	VaR (31-Mar) \$m	Mean value \$m	Max value \$m	Min value \$m	VaR (31-Mar) \$m
Commodities	40	87	28	33	45	67	27	33
Equities ⁽¹⁾	8	13	5	5	12	17	5	5
Foreign Exchange	6	12	2	6	4	11	2	3
Interest Rates	11	18	6	13	6	8	4	6
Aggregate	41	87	26	32	45	69	28	35

⁽¹⁾ Equities figures incorporate the Equity specific risk amount.

12.2.2 Stressed Value at Risk Figures (10-day 99%)

APS 330 Table 14(f)

	For the 12 months to 31 March 2021				For the 12 months to 31 March 2020			
	VaR over the current reporting period				VaR over the previous reporting period			
	Mean value \$m	Max value \$m	Min value \$m	VaR (31-Mar) \$m	Mean value \$m	Max value \$m	Min value \$m	VaR (31-Mar) \$m
Commodities	70	103	50	84	61	98	36	60
Equities ⁽¹⁾	18	31	9	15	38	61	14	14
Foreign Exchange	11	28	2	7	10	33	0	15
Interest Rates	26	43	15	43	17	22	11	15
Aggregate	63	92	45	87	62	95	30	52

⁽¹⁾ Equities figures incorporate the Equity specific risk amount.

12.2.3 Debt Security Specific Risk Figures

Regulatory capital for Macquarie's debt security specific risk (including securitisations held in the trading book) is calculated using the APRA standard method.

APS 330 Table 13(b)

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Debt specific risk	55	58

The specific risks referred to above arise from movements in credit curves in the Macquarie trading book.

12.2.4 Interest Rate Risk in the Banking Book (IRRBB)

Interest rate exposures, where possible, are transferred into the trading books of Commodities and Global Markets and Group Treasury, and managed under traded market risk limits. The residual risks in the banking book are not material but are nevertheless monitored and constrained by RMG and reported to senior management monthly. Macquarie measures and monitors interest rate risk on both an economic value and earnings basis. IRRBB is measured on a monthly basis using an APRA approved repricing gap model with monthly bucketing of exposures.

The total IRRBB capital is calculated for each currency in accordance with APS 117 Capital Adequacy: Interest Rate Risk in the Banking Book (Advanced ADIs). Macquarie's internal model sums the change in economic value arising from the following risk categories:

- Repricing and yield curve (parallel and non-parallel moves);
- Basis (imperfect correlation between indices of the same tenor)
- Optionality (breakdowns in assumptions used for hedging); and
- Embedded gains and losses (difference between the fair-value and book-value arising from past interest rate movements).

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
IRRBB RWA ⁽¹⁾	414	-

⁽¹⁾ The IRRBB RWA were revised from \$373m to \$414m subsequent to Macquarie's FY2021 results announcement on 7 May 2021.

12.0 Market Risk

continued

APS 330 Table 17(b)

	As at 31 March 2021	As at 31 March 2020
	Change in economic value	
Stress testing: interest rate shock applied	\$m	\$m
AUD		
200 basis point parallel increase	20.7	3.5
200 basis point parallel decrease	(23.6)	(3.2)
CAD		
200 basis point parallel increase	(0.3)	(0.3)
200 basis point parallel decrease	0.3	0.3
EUR		
200 basis point parallel increase	(6.8)	(7.6)
200 basis point parallel decrease	15.4	23.3
GBP		
200 basis point parallel increase	(1.9)	(3.4)
200 basis point parallel decrease	3.9	9.7
USD		
200 basis point parallel increase	(5.4)	(9.9)
200 basis point parallel decrease	35.5	55.2

Note that the brackets in the above table indicate a loss in economic value due to movements in interest rates.

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
IRRBB regulatory capital requirement – AUD	33	–

13.0 Equity Risk

Equity risk is the risk of loss arising from banking book equity-type exposures. These exposures include:

- holdings in specialised funds managed by Macquarie;
- property equity, including property trusts and direct property equity investments; and
- other equity investments.

All of the above equity risk positions are subject to an aggregate Equity Risk Limit (ERL). The ERL is set by the Board by reference to the Risk Appetite Test that is described further in the Capital Adequacy Section 4. When the Board sets the limit, it also considers the level of earnings, capital and market conditions. RMG reviews the limit periodically and reports the results of the review to the Group Risk and Compliance Committee (GRCC) and the Board.

13.1 Accounting for Equity Holdings in the Banking Book

Equity investment positions have varying accounting treatments depending on the nature of the exposure. These include:

- equity accounting for investments in associates;
- Investment fair valued through profit or loss. Macquarie has not elected to designate any equity positions as fair value through OCI.

In addition to equity investment positions in the Banking Book, Macquarie also has equity investments in trading portfolios at fair value through profit or loss, which are included in the Market Risk calculation.

13.1.1 Investments in Associates

Equity accounting is applied to investments in which Macquarie has significant influence or joint control (joint ventures). These equity investments are described as Investments in Associates. Equity accounting is applied such that Macquarie's share of its investee's post acquisition profit or losses are recorded in Macquarie's income statement, and the share of its post-acquisition movements in reserves in Macquarie's Consolidated Statement of Comprehensive Income. Dividends or distributions from associates or joint ventures reduce the carrying amount of the investment. Where there is an indicator of impairment, the carrying amount of the investment is tested for impairment by comparing its recoverable amount with its carrying value. Impairment losses are recognised as impairment charges as part of other operating income and charges. A reversal of a previously recognised impairment loss is recognised only to the extent that the investment's carrying value does not exceed the carrying amount that would have been determined (including consideration of any equity accounted losses), if no impairment loss had been recognised.

13.1.2 Fair value Investments through profit or loss

Fair value reflects the price that would be received to sell an asset or paid to transfer a liability in an orderly transaction between market participants at the measurement date.

Quoted prices or rates are used to determine fair value where an active market exists. If the market for a financial instrument is not active, fair values are estimated using present value or other valuation techniques, using inputs based on market conditions prevailing at the measurement date.

Gains and losses arising from subsequent changes in fair value of equity investments are recognised in the Income Statement within investment income under other operating income and charges.

13.0 Equity Risk

continued

13.2 Equity Investments

The table below details the carrying value of equity investments held by Macquarie, in comparison to the applicable fair value of these equities. The categorisation of listed and unlisted investments is required for APRA regulatory reporting purposes – these include the equity investments under each of the accounting classifications outlined above. Valuations have been based on the requirements of accounting standards.

APS 330 Table 16(b) and (c)

	As at 31 March 2021		As at 31 March 2020	
	Carrying value \$m	Fair value ⁽²⁾ \$m	Carrying value \$m	Fair value ⁽²⁾ \$m
Equity investments				
Value of listed (publicly traded) equities ⁽¹⁾	53	53	39	39
Value of unlisted (privately held) equities ⁽¹⁾	451	451	383	383
Total	504	504	422	422

⁽¹⁾ At MBL and its subsidiaries, the Consolidated Entity.

⁽²⁾ Includes Investments in Associates which are equity accounted and not fair valued and undrawn commitments (off balance sheet) which are deemed in the nature of equity for Regulatory Capital purposes.

13.3 Capital Requirements Arising from Equity Risks

Equity investments are deducted from Common Equity Tier 1 capital under APRA's version of the Basel III rules.

APS 330 Table 16(f)

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Deduction amount		
Equity investments ⁽¹⁾	491	416

⁽¹⁾ At Level 2 regulatory group.

13.4 Gains and Losses on Equity Investments

APS 330 Table 16(d) and (e)

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Gains / (losses) on equity investments		
Cumulative realised gains ⁽¹⁾	27	30
Total unrealised gains/(losses)	75	(21)
Total unrealised gains/(losses) included in Tier 1	75	(21)

⁽¹⁾ Gains are defined as proceeds on sale less costs net of provisions

14.0 Operational Risk

Operational risk is inherent in Macquarie's business. Macquarie defines operational risk as the risk of loss resulting from inadequate or failed internal processes, controls or systems or from external events.

It also includes the failure or inadequate management of other risk types.

14.1 Macquarie's Operational Risk Management Framework

Operational Risk Objectives

Macquarie's *Operational Risk Management Framework (ORMF)* is designed to identify, assess and manage operational risks within the organisation. The key objectives of the framework are:

- risk identification, analysis and acceptance.
- execution and monitoring of risk management practices.
- reporting and escalation of risk information on a routine and exception basis.

Operational Risk Management Process

Operating and Central Service Groups implement the *ORMF* in a manner that is tailored to their specific operational risk profile. However, to ensure consistency and minimum standards the framework includes the following mandatory elements:

- A robust change management process to ensure operational risks in new activities or products are identified, addressed and managed prior to implementation
- An operational risk self-assessment process to identify operational risks at the business level, evaluate controls and develop action plans to address deficiencies
- Recording operational risk incidents in a centralised reporting system. Incidents are analysed to identify trends and establish lessons learnt on the effectiveness of controls
- Allocation of operational risk capital to all Macquarie businesses as a tool to further encourage positive behaviour in Macquarie's day-to-day management of operational risk
- Macquarie-wide policies that require a consistent approach and minimum standards on specific operational risk matters
- Embedded operational risk representatives in Operating Groups who act as delegates of the Operating Group Head. These representatives are required to assess whether operational risks are addressed appropriately and that the *ORMF* is executed within their area.

Operational Risk – RWA

Structure and Organisation of the Operational Risk Function

Most Macquarie operational risk staff operate at the business level. These Business Operational Risk Managers (BORMs) are responsible for embedding operational risk management within their business. They report directly to the relevant business and have a dotted reporting line to the Head of RMG Operational Risk and Governance.

RMG Operational Risk and Governance is a division of RMG and is managed separately from other risk disciplines within RMG. RMG Operational Risk and Governance is responsible for ensuring the *ORMF* remains appropriate and that skilled resources are available to support it. It is also responsible for Macquarie's operational risk capital measurement methodology.

RMG regularly reports on the operational risk profile and the effectiveness of the Framework to the BRiC and to senior management.

14.2 Operational Risk Capital Calculation

APRA approved Macquarie's use of the AMA for assessing operational risk capital in December 2007.

Macquarie holds operational risk capital to absorb potential losses arising from operational risk exposures.

Macquarie's operational risk capital framework has two main elements:

- A bi-annual scenario approach for modelling operational risk losses and to determine operational risk capital
- a process for allocating capital to businesses based on risk exposures.

Operational risk scenarios identify key risks that, while very low in probability may, if they occurred, result in large losses. When identifying the potential for such losses, consideration is given to the individual statistical distribution for each scenario, external loss data, internal loss data, risk and control factors and the contribution of expert opinion from Operating and Central Service Groups. Scenario estimates are then modelled to determine the operational risk component of regulatory capital required to be held by Macquarie at the 99.9th percentile.

Over time, changes in operational risk capital reflect:

- new or significantly changed business activity or growth
- changes in the external environment such as new regulations or movements in the economic cycle.

Mitigation of Operational Risk through Insurance

Macquarie does not currently use insurance in its AMA model for the purpose of operational risk capital reduction.

	As at 31 March 2021 \$m	As at 31 March 2020 \$m
Operational Risk RWA	10,337	10,655

15.0 Leverage Ratio Disclosures

The leverage ratio is a non-risk based ratio that is intended to restrict the build-up of excessive leverage in the banking system and acts as a supplementary measure to create a back-stop for the risk-based capital requirements.

The Basel Committee on Banking Supervision (BCBS), in December 2017, confirmed that the leverage ratio will have a minimum regulatory requirement of 3%, effective from 1 January 2018. In November 2019, APRA released a draft standard on the Leverage ratio which included a minimum leverage ratio requirement of 3.5% for IRB banks. These changes are proposed to apply from 1 January 2023.

Macquarie Bank Group's March 2021 APRA leverage ratio has increased by 0.3% from the December 2020 APRA leverage ratio of 5.2%. This is primarily driven by the increase in Tier 1 capital during the period.

	31 March 2021 \$m	31 December 2020 \$m	30 September 2020 \$m	30 June 2020 \$m
Capital and total exposures				
Tier 1 Capital	13,468	12,855	13,699	13,522
Total exposures	245,384	245,166	233,135	225,591
Leverage ratio				
Macquarie Level 2 regulatory group Leverage ratio	5.5%	5.2%	5.9%	6.0%

15.1 Leverage Ratio Disclosure Template

APS 330 Table 18

Item	As at 31 March 2021 \$m
On-balance sheet exposures	
1 On-balance sheet items (excluding derivatives and securities financing transactions (SFTs), but including collateral)	159,793
2 (Asset amounts deducted in determining Tier 1 capital)	(2,119)
3 Total on-balance sheet exposures (excluding derivatives and SFTs) (sum of rows 1 and 2)	157,674
Derivative exposures	
4 Replacement cost associated with all derivatives transactions (i.e. net of eligible cash variation margin)	13,700
5 Add-on amounts for potential future credit exposure (PFCE) associated with all derivatives transactions	22,790
6 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the Australian Accounting Standards	-
7 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	(901)
8 (Exempted central counterparty (CCP) leg of client-cleared trade exposures)	(7,915)
9 Adjusted effective notional amount of written credit derivatives	1,141
10 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)	(243)
11 Total derivative exposures (sum of rows 4 to 10)	28,571
SFT exposures	
12 Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	38,117
13 (Netted amounts of cash payables and cash receivables of gross SFT assets)	(376)
14 CCR exposure for SFT assets	2,754
15 Agent transaction exposures	-
16 Total SFT exposures (sum of rows 12 to 15)	40,496
Other off-balance sheet exposures	
17 Off-balance sheet exposure at gross notional amount	21,420
18 (Adjustments for conversion to credit equivalent amounts)	(2,776)
19 Other off-balance sheet exposures (sum of rows 17 and 18)	18,643
Capital and total exposures	
20 Tier 1 Capital	13,468
21 Total exposures (sum of rows 3, 11, 16 and 19)	245,384
Leverage ratio	
22 Leverage ratio	5.5%

15.2 Summary Comparison of Accounting Assets versus Leverage Ratio Exposure Measure

Item	As at 31 March 2021 \$m
1 Total consolidated assets as per published financial report	216,848
2 Adjustment for investments in banking, financial, insurance or commercial entities that are consolidated for accounting purposes but outside the scope of regulatory consolidation	360
3 Adjustment for assets held on the balance sheet in a fiduciary capacity pursuant to the Australian Accounting Standards but excluded from the leverage ratio exposure measure	–
4 Adjustments for derivative financial instruments	8,027
5 Adjustment for SFTs (i.e. repos and similar secured lending)	2,608
6 Adjustment for off-balance sheet exposures (i.e. Conversion to credit equivalent amounts of off-balance sheet exposures)	18,643
7 Other adjustments	(1,102)
8 Leverage ratio exposure	245,384

16.0 Liquidity Coverage Ratio Disclosures

continued

Liquidity Coverage Ratio disclosure template

APS 330 Table 20

Liquidity Coverage Ratio disclosure template	For the 3 months to 31 March 2021		For the 3 months to 31 December 2020	
	Total unweighted value (average) \$m	Total weighted value (average) \$m	Total unweighted value (average) \$m	Total weighted value (average) \$m
Liquid assets, of which:				
1 High quality liquid assets (HQLA)		25,413		24,700
2 Alternative liquid assets (ALA)		10,640		9,341
3 Reserve Bank of New Zealand (RBNZ) securities		-		-
Cash outflows				
4 Retail deposits and deposits from small business customers, of which:	47,962	5,225	54,565	5,477
5 Stable deposits	13,138	657	18,856	943
6 Less stable deposits	34,824	4,568	35,709	4,534
7 Unsecured wholesale funding, of which:	36,841	19,762	24,502	14,796
8 Operational deposits (all counterparties) and deposits in networks for cooperative banks	15,423	2,877	6,708	1,669
9 Non-operational deposits (all counterparties)	17,240	12,707	16,234	11,567
10 Unsecured debt	4,178	4,178	1,560	1,560
11 Secured wholesale funding		1,163		935
12 Additional requirements, of which:	28,074	12,291	23,083	9,124
13 Outflows related to derivatives exposures and other collateral requirements	11,415	10,352	7,640	7,640
14 Outflows related to loss of funding on debt products	498	498	212	212
15 Credit and liquidity facilities	16,161	1,441	15,231	1,272
16 Other contractual funding obligations	10,315	10,265	13,163	13,135
17 Other contingent funding obligations	9,632	499	9,292	514
18 Total cash outflows		49,205		43,981
Cash Inflows				
19 Secured lending (e.g. reverse repos)	24,397	7,742	28,334	5,648
20 Inflows from fully performing exposures	4,153	3,718	3,358	2,890
21 Other cash inflows	17,040	17,040	15,609	15,609
22 Total cash inflows	45,590	28,500	47,301	24,147
23 Total liquid assets		36,053		34,041
24 Total net cash outflows		20,705		19,834
25 Liquidity Coverage Ratio (%)⁽¹⁾⁽²⁾		174%		172%

⁽¹⁾ The LCR for the 3 months to 31 March 2021 is calculated from 62 daily LCR observations (3 months to 31 December 2020 was calculated from 63 daily LCR observations).

⁽²⁾ As announced on 1 April 2021, APRA has imposed a 15% add-on to the Net Cash Outflow component of the LCR calculation, effective from 1 April 2021. The pro forma 3 month average LCR to 31 March 2021 including this add-on is 151%.

The Liquidity Coverage Ratio (LCR)

The LCR requires unencumbered liquid assets be held to cover expected net cash outflows (NCOs) under a regulatory-defined stress scenario lasting 30 calendar days. Macquarie's 3 month average LCR to 31 March 2021 was 174% (based on 62 daily observations). This was an increase of 2% from the average for the 3 months to 31 December 2020, as a result of an increase in liquid assets partially offset by an increase in NCOs.

Liquidity management is performed centrally by Group Treasury, with oversight from the Asset and Liability Committee (ALCO) and the Risk Management Group (RMG). Furthermore, the Board-approved Liquidity Policy and Risk Tolerance is designed to ensure Macquarie maintains sufficient liquidity to meet its obligations as they fall due.

Macquarie sets internal management and Board-approved minimum limits for the LCR above the regulatory minimum level and monitors its aggregate LCR position against these limits on a daily basis. Macquarie also monitors the LCR position on a standalone basis for major currencies in which it operates, with the high quality liquid assets (HQLA) portfolio being denominated and held in both Australian Dollars and a range of other currencies. This ensures that liquid assets are maintained consistent with the distribution of liquidity needs by currency, allowing for an acceptable level of currency mismatches.

Macquarie actively considers the impact of business decisions on the LCR, as well as internal liquidity metrics that form part of the broader liquidity risk management framework. Macquarie's LCR fluctuates on a daily basis as a result of normal business activities and, accordingly, ongoing fluctuations in the reported LCR are expected and are not necessarily indicative of a changing risk appetite. Some examples of factors that can influence the LCR include wholesale funding activities (such as upcoming maturities and pre-funding expected future asset growth), the degree of activity in Macquarie's capital markets facing businesses, the composition and nature of liquid asset holdings, and a variety of other external market considerations that could impact day-to-day collateral requirements.

Liquid Assets

In addition to cash and central bank deposits, Macquarie's liquid assets portfolio includes Australian Dollar Commonwealth Government and semi-Government securities, foreign currency HQLA securities and Macquarie's allocations under the Committed Liquidity Facility (CLF) and the Term Funding Facility (TFF).

Macquarie's CLF allocation, which reduced from \$8,500 million to \$7,900 million from 1 February 2021, as well as the average undrawn balance of Macquarie's TFF allowances over the March quarter, are reflected in the disclosure template under 'Alternative Liquid Assets (ALA)'. Note the disclosed balance of \$10,640 million does not include the required 'open-repo' of internal self-securitised RMBS with the RBA (which increases cash balances in the Exchange Settlement Account (ESA) with the RBA and is considered an ongoing 'utilisation' of the CLF).

As at 31 March 2021, Macquarie has an undrawn TFF Supplementary Allowance of \$1,271 million. Macquarie also has access to the TFF Additional Allowance, the final volume

of which will be determined by business lending growth to April 2021. Macquarie has included \$4,631 million of its TFF Additional Allowance in its LCR from 1 March 2021.

Net Cash Outflows (NCOs)

NCOs in the LCR include contractual and assumed cash outflows, offset by certain allowable contractual cash inflows. Some of the key drivers of Macquarie's NCOs include:

Retail and SME deposits: assumed regulatory outflow relating to deposits from retail and SME customers that are at-call or potentially callable within 30 days.

Unsecured wholesale funding: includes remaining deposits which are not received from retail or SME customers along with unsecured debt balances contractually maturing within 30 days.

Secured wholesale funding and lending: represent inflows and outflows from secured lending and borrowing activities contractually maturing within 30 days, such as repurchase and reverse repurchase agreements.

Outflows relating to derivative exposures and other collateral requirements: includes gross contractual cash outflows relating to contractually maturing derivative contracts (with gross inflows on maturing derivative contracts profiled in 'other cash inflows'). Further, contingent liquidity outflows such as potential collateral requirements from market movements, a 3-notch credit ratings downgrade and withdrawal of excess collateral placed with Macquarie are also included in this category.

Inflows from fully performing exposures: In Macquarie's LCR, a large component of this balance relates to excess liquidity placed on an overnight or very short-term basis with third parties (internally considered part of the cash and liquid asset portfolio).

Other contractual funding obligations and other cash inflows: includes other gross flows not profiled elsewhere in the LCR. The volumes in these categories are large relative to Macquarie's total cash outflows and inflows, however they include the following balances in particular:

Segregated client funds placed with Macquarie: Macquarie acts as a clearing agent for clients on various futures exchanges. Clients place margin with Macquarie and Macquarie places this margin either directly with the exchange, holds it in other segregated external asset accounts or retains a portion on deposit with Macquarie. Some of the balances are recorded on a gross basis on Macquarie's balance sheet and APRA require these to be profiled as gross inflows and outflows in the LCR.

Security and broker settlement balances: these represent securities that have been purchased or sold by Macquarie that have not yet settled and broker balances where stock has been bought or sold on behalf of clients but payment has not been made to / received from the client. APRA require these balances to be reflected on a gross basis in the LCR as 100% weighted inflows and outflows. The net effect of these balances on Macquarie's average LCR is minimal.

17.0 Net Stable Funding Ratio Disclosures

Net Stable Funding Ratio disclosure template

APS 330 Table 21

		As at 31 March 2021				
		Unweighted value by residual maturity				Weighted value \$m
		No maturity \$m	<6 months \$m	>=6 months to < 1yr \$m	>= 1yr \$m	
Net Stable Funding Ratio disclosure template						
Available Stable Funding (ASF) Item						
1	Capital	14,079	–	–	5,678	19,757
2	Regulatory Capital	14,079	–	–	5,678	19,757
3	Other capital instruments	–	–	–	–	–
4	Retail deposits and deposits from small business customers	47,389	5,221	–	–	48,077
5	Stable deposits	12,633	1,930	–	–	13,835
6	Less stable deposits	34,756	3,291	–	–	34,242
7	Wholesale funding	24,906	37,855	5,892	30,712	46,993
8	Operational deposits	12,254	3,003	–	–	7,629
9	Other wholesale funding	12,652	34,852	5,892	30,712	39,364
10	Liabilities with matching interdependent assets	–	–	–	–	–
11	Other Liabilities	7,756	12,793	28	447	461
12	NSFR derivative liabilities	–	–	6,209	–	–
13	All other liabilities and equity not included in the above categories	7,756	6,584	28	447	461
14	Total ASF					115,288
Required Stable Funding (RSF) Item						
15(a)	Total NSFR (HQLA)	10,071	431	197	8,280	1,691
15(b)	ALA	–	1,219	649	13,657	1,552
15(c)	RBNZ securities					
16	Deposits held at other financial institutions for operational purposes	–	–	–	–	–
17	Performing loans and securities	13,965	33,381	6,397	78,898	76,053
18	Performing loans to financial institutions secured by Level 1 HQLA	2,328	12,318	–	–	1,465
19	Performing loans to financial institutions secured by non-Level 1 HQLA and unsecured performing loans to financial institutions	6,230	14,874	774	4,736	8,288
20	Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and public sector entities (PSEs), of which:	1,404	4,937	4,128	16,942	19,972
21	With a risk weight of less than or equal to 35% under APS 112	–	109	80	1,583	1,124
22	Performing residential mortgages	–	1,029	1,007	56,157	41,716
23	With a risk weight equal to 35%	–	962	938	51,604	37,691
24	Securities that are not in default and do not qualify as HQLA, including exchange-traded equities	4,003	223	488	1,063	4,612
25	Assets with matching interdependent liabilities	–	–	–	–	–
26	Other assets:	11,722	5,409	–	22,800	20,177
27	Physical traded commodities, including gold	10,036	–	–	–	8,531
28	Assets posted as initial margin for derivative contracts and contributions to default funds of central counterparties (CCPs)	–	–	3,121	–	2,653
29	NSFR derivative assets	–	–	8,601	–	2,392
30	NSFR derivative liabilities before deduction of variation margin	–	–	8,590	–	1,718
31	All other assets not included in the above categories	1,686	5,409	–	2,488	4,883
32	Off-balance sheet items			18,714		828
33	Total RSF					100,301
34	Net Stable Funding Ratio (%)⁽¹⁾					115%

⁽¹⁾ As announced on 1 April 2021, APRA has imposed a 1% decrease to the Available Stable Funding component of the NSFR calculation, effective from 1 April 2021. The pro forma NSFR at 31 March 2021 including this adjustment is 114%.

Net Stable Funding Ratio disclosure template

APS 330 Table 21

		As at 31 December 2020				
		Unweighted value by residual maturity				Weighted value
		No maturity	<6 months	>=6 months to < 1yr	>= 1yr	
		\$m	\$m	\$m	\$m	\$m
Net Stable Funding Ratio disclosure template						
Available Stable Funding (ASF) Item						
1	Capital	13,435	–	–	4,330	17,765
2	Regulatory Capital	13,435	–	–	4,330	17,765
3	Other capital instruments	–	–	–	–	–
4	Retail deposits and deposits from small business customers	53,768	5,178	–	–	54,093
5	Stable deposits	18,904	1,921	–	–	19,784
6	Less stable deposits	34,864	3,257	–	–	34,309
7	Wholesale funding	14,312	46,983	6,029	31,743	43,293
8	Operational deposits	4,029	3,052	–	–	3,540
9	Other wholesale funding	10,283	43,931	6,029	31,743	39,753
10	Liabilities with matching interdependent assets	–	–	–	–	–
11	Other Liabilities	6,740	9,840	5	531	534
12	NSFR derivative liabilities	–	–	5,451	–	–
13	All other liabilities and equity not included in the above categories	6,740	4,389	5	531	534
14	Total ASF					115,685
Required Stable Funding (RSF) Item						
15(a)	Total NSFR (HQLA)	5,224	327	121	11,788	3,316
15(b)	ALA	–	1,409	339	9,745	1,149
15(c)	RBNZ securities					
16	Deposits held at other financial institutions for operational purposes	–	–	–	–	–
17	Performing loans and securities	17,998	37,732	6,317	75,710	76,503
18	Performing loans to financial institutions secured by Level 1 HQLA	2,932	13,460	–	–	1,639
19	Performing loans to financial institutions secured by non–Level 1 HQLA and unsecured performing loans to financial institutions	7,424	16,323	1,205	3,138	7,302
20	Performing loans to non– financial corporate clients, loans to retail and small business customers, and loans to sovereigns, central banks and public sector entities (PSEs), of which:	1,465	6,311	3,958	16,343	20,153
21	With a risk weight of less than or equal to 35% under APS 112	–	95	74	1,524	1,075
22	Performing residential mortgages	–	1,023	934	55,711	41,406
23	With a risk weight equal to 35%	–	909	870	51,309	37,494
24	Securities that are not in default and do not qualify as HQLA, including exchange–traded equities	6,177	615	220	518	6,003
25	Assets with matching interdependent	–	–	–	–	–
26	Other assets	11,766	4,744	28	23,120	21,304
27	Physical traded commodities	10,119	–	–	–	8,601
28	Assets posted as initial margin for derivative contracts and contributions to default funds of central counterparties (CCPs)	–	–	3,231	–	2,745
29	NSFR derivative assets	–	–	8,670	–	3,218
30	NSFR derivative liabilities before deduction of variation margin	–	–	8,625	–	1,725
31	All other assets not included in the above categories	1,647	4,744	28	2,594	5,013
32	Off-balance sheet items	–	–	18,574	–	832
33	Total RSF					103,104
34	Net Stable Funding Ratio (%)					112%

17.0 Net Stable Funding Ratio Disclosures

continued

The Net Stable Funding Ratio (NSFR)

The NSFR is a twelve month structural funding metric, requiring that “available stable funding” (ASF) be sufficient to cover “required stable funding” (RSF), where ‘stable’ funding has an actual or assumed maturity of greater than twelve months. Macquarie’s NSFR as at 31 March 2021 was 115% (including Macquarie’s TFF Supplementary Allowance of \$1,271 million and Additional Allowance of \$4,631 million), and 112% as at 31 December 2020 (including Macquarie’s TFF Supplementary Allowance of \$1,271). The NSFR increased over the quarter as a result of a decrease in RSF with only a slight decrease in ASF.

The NSFR seeks to encourage ADIs to fund their activities with more stable sources of funding on an ongoing basis, and thereby promote greater balance sheet resilience. It also aims to reduce an ADI’s reliance on less stable sources of funding. These requirements are in line with Macquarie’s Board-approved Liquidity Policy and Risk Tolerance.

Macquarie sets internal management and Board-approved minimum limits for the NSFR above the regulatory minimum level and monitors its aggregate NSFR position against these limits on a daily basis.

Whilst the NSFR and LCR are regulatory minima, Macquarie also models a number of additional internal liquidity scenarios covering both market-wide and Macquarie name-specific crises. Macquarie actively considers the impact of business decisions on the NSFR and LCR, as well as other internal liquidity metrics that form part of its broader liquidity risk management framework.

Macquarie’s NSFR fluctuates as a result of normal business activities and, accordingly, ongoing fluctuations in the reported NSFR are expected and are not necessarily indicative of a changing risk appetite. Some examples of factors that can influence the NSFR include wholesale funding activities (such as pre-funding expected future asset growth), growth in home loans and customer deposits, equity and hybrids issuance, the degree of activity in Macquarie’s capital markets facing businesses, and a variety of other external market considerations.

Calculation of the Net Stable Funding Ratio

Under the regulatory rules, Available Stable Funding factors are applied to Macquarie’s capital and liabilities; while Required Stable Funding factors are applied to assets and off-balance sheet exposures. This calculation is shown in table 21 on pages 66 and 67, and is based on spot balances.

Disclaimer

- The material in this document has been prepared by Macquarie Bank Limited ABN 46 008 583 542 (MBL) purely for the purpose of explaining the basis on which MBL has prepared and disclosed certain capital requirements and information about the management of risks relating to those requirements and for no other purpose. Information in this document should not be considered as advice or a recommendation to investors or potential investors in relation to holding, purchasing or selling securities or other financial products or instruments and does not take into account your particular investment objectives, financial situation or needs. Before acting on any information you should consider the appropriateness of information having regard to the matters, any relevant offer document and in particular, you should seek independent financial advice. No representation or warranty is made as to the accuracy, completeness or reliability of the information. All securities and financial product or instrument transactions involve risks, which include (among others) the risk of adverse or unanticipated market, financial or political developments and, in international transactions, currency risk.
- This document may contain forward looking statements that is, statements related to future, not past, events or other matters – including, without limitation, statements regarding our intent, belief or current expectations with respect to MBL’s businesses and operations, market conditions, results of operation and financial condition, capital adequacy, provisions for impairments and risk management practices. Readers are cautioned not to place undue reliance on these forward looking statements. Macquarie does not undertake any obligation to publicly release the result of any revisions to these forward looking statements or to otherwise update any forward looking statements, whether as a result of new information, future events or otherwise, after the date of this document. Actual results may vary in a materially positive or negative manner. Forward looking statements and hypothetical examples are subject to uncertainty and contingencies outside MBL’s control. Past performance is not a reliable indication of future performance.
Unless otherwise specified all information is at 31 March 2021.
- Although Pillar 3 disclosures are intended to provide transparent disclosures on a common basis the information contained in this document may not be directly comparable with other banks. This may be due to a number of factors such as:
 - The mix of business exposures between banks
 - Pillar 2 capital requirements are excluded from this disclosure but play a major role in determining both the total capital requirements of the bank and any surplus capital available.
 - Difference in implementation of Basel III framework i.e. APRA has introduced stricter requirements (APRA superequivalence).

Appendix 1 Regulatory Capital Reconciliation

1.1 Common Disclosures Template

The capital disclosures detailed in the template below represents Basel III common disclosure requirements. These tables should be read in conjunction with Section 1.2 Regulatory Balance sheet and Section 1.3 Reconciliation between common disclosures template and the Regulatory Balance Sheet.

		As at 31 March 2021	Table Reference
	Common Equity Tier 1 capital: instruments and reserves	\$m	
1	Directly issued qualifying ordinary shares (and equivalent for mutually-owned entities) capital	8,521	Table f
2	Retained earnings	5,253	
3	Accumulated other comprehensive income (and other reserves)	305	
4	Directly issued capital subject to phase out from CET1 (only applicable to mutually-owned companies)	-	
5	Ordinary share capital issued by subsidiaries and held by third parties (amount allowed in group CET1)	-	
6	Common Equity Tier 1 capital before regulatory adjustments	14,079	
	Common Equity Tier 1 capital: regulatory adjustments		
7	Prudential valuation adjustments	-	
8	Goodwill (net of related tax liability)	39	Table b
9	Other intangibles other than mortgage servicing rights (net of related tax liability)	96	Table b
10	Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	32	Table a
11	Cash-flow hedge reserve	(113)	
12	Shortfall of provisions to expected losses	17	
13	Securitisation gain on sale (as set out in paragraph 562 of Basel II framework)	-	
14	Gains and losses due to changes in own credit risk on fair valued liabilities	3	
15	Defined benefit superannuation fund net assets	-	
16	Investments in own shares (if not already netted off paid-in capital on reported balance sheet)	-	
17	Reciprocal cross-holdings in common equity	-	
18	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the ADI does not own more than 10% of the issued share capital (amount above 10% threshold)	-	Table c
19	Significant investments in the ordinary shares of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions (amount above 10% threshold)	-	Table c
20	Mortgage service rights (amount above 10% threshold)	-	
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability)	-	Table a
22	Amount exceeding the 15% threshold	-	
23	of which: significant investments in the ordinary shares of financial entities	-	Table c
24	of which: mortgage servicing rights	-	
25	of which: deferred tax assets arising from temporary differences	-	Table a
	APRA Specific Regulatory Adjustments		
26	National specific regulatory adjustments (sum of rows 26a, 26b, 26c, 26d, 26e, 26f, 26g, 26h, 26i and 26j)	2,165	
26a	of which: treasury shares	-	
26b	of which: offset to dividends declared under a dividend reinvestment plan (DRP), to the extent that the dividends are used to purchase new ordinary shares issued by the ADI	-	
26c	of which: deferred fee income	-	
26d	of which: equity investments in financial institutions not reported in rows 18, 19 and 23	389	Table c
26e	of which: deferred tax assets not reported in rows 10, 21 and 25	761	Table a
26f	of which: capitalised expenses	546	

	As at 31 March 2021	Table Reference
	\$m	
Common Equity Tier 1 capital: instruments and reserves		
26g	306	Table c
	of which: investments in commercial (non-financial) entities that are deducted under APRA prudential requirements	
26h	–	
	of which: covered bonds in excess of asset cover in pools	
26i	–	
	of which: undercapitalisation of a non-consolidated subsidiary	
26j	163	
	of which: other national specific regulatory adjustments not reported in rows 26a to 26i ¹	
27	–	
	Regulatory adjustments applied to Common Equity Tier 1 due to insufficient Additional Tier 1 and Tier 2 to cover deductions	
28	2,239	
	Total regulatory adjustments to Common Equity Tier 1	
29	11,840	
	Common Equity Tier 1 Capital (CET1)	
Additional Tier 1 Capital: instruments		
30	1,628	
	Directly issued qualifying Additional Tier 1 instruments	
31	–	
	of which: classified as equity under applicable accounting standards	
32	1,628	
	of which: classified as liabilities under applicable accounting standards	
33	–	
	Directly issued capital instruments subject to phase out from Additional Tier 1	
34	–	
	Additional Tier 1 instruments (and CET1 instruments not included in row 5) issued by subsidiaries and held by third parties (amount allowed in group AT1)	
35	–	
	of which: instruments issued by subsidiaries subject to phase out	
36	1,628	Table d
	Additional Tier 1 Capital before regulatory adjustments	
Additional Tier 1 Capital: Regulatory adjustments		
37	–	
	Investments in own Additional Tier 1 instruments	
38	–	
	Reciprocal cross-holdings in Additional Tier 1 instruments	
39	–	
	Investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation, net of eligible short positions, where the ADI does not own more than 10% of the issued share capital (amount above 10% threshold)	
40	–	
	Significant investments in the capital of banking, financial and insurance entities that are outside the scope of regulatory consolidation (net of eligible short positions)	
41	–	
	National specific regulatory adjustments (sum of rows 41a, 41b and 41c)	
41a	–	
	of which: holdings of capital instruments in group members by other group members on behalf of third parties	
41b	–	
	of which: investments in the capital of financial institutions that are outside the scope of regulatory consolidations not reported in rows 39 and 40	
41c	–	
	of which: other national specific regulatory adjustments not reported in rows 41a and 41b	
42	–	
	Regulatory adjustments applied to Additional Tier 1 due to insufficient Tier 2 to cover deductions	
43	–	
	Total regulatory adjustments to Additional Tier 1 capital	
44	1,628	
	Additional Tier 1 capital (AT1)	
45	13,468	
	Tier 1 Capital (T1=CET1+AT1)	
Tier 2 Capital: instruments and provisions		
46	4,040	Table e
	Directly issued qualifying Tier 2 instruments	
47	172	Table e
	Directly issued capital instruments subject to phase out from Tier 2	
48	–	
	Tier 2 instruments (and CET1 and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties (amount allowed in group T2)	
49	–	
	of which: instruments issued by subsidiaries subject to phase out	
50	11	
	Provisions	
51	4,223	
	Tier 2 Capital before regulatory adjustments	
Tier 2 Capital: regulatory adjustments		

⁽¹⁾ Includes \$116m also applicable for Basel III regulatory adjustments.

Appendix 1 Regulatory Capital Reconciliation continued

	As at 31 March 2021	Table Reference
	\$m	
Common Equity Tier 1 capital: instruments and reserves		
52	-	
53	-	
54	-	
55	-	
56	-	
56a	-	
56b	-	
56c	-	
57	-	
58	4,223	
59	17,691	
60	94,000	
Capital ratios and buffers		
61	12.6%	
62	14.3%	
63	18.8%	
64	7.0%	
65	2.5%	
66	0.0%	Table h
67	-	
68	12.6%	
National minima (if different from Basel III)		
69	-	
70	-	
71	-	
Amount below thresholds for deductions (not risk-weighted)		
72	57	Table c
73	332	Table c
74	-	
75	761	Table a
Applicable caps on the inclusion of provisions in Tier 2		
76	11	
77	87	
78	-	
79	419	
Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2018 and 1 Jan 2022)		
80	-	

		As at 31 March 2021	Table Reference
		\$m	
Common Equity Tier 1 capital: instruments and reserves			
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	
83	Amount excluded from AT1 instruments due to cap (excess over cap after redemptions and maturities)	-	
84	Current cap on T2 instruments subject to phase out arrangements	172	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	912	

⁽¹⁾ This represents CET1 ratio of the ADI, less any common equity used to meet the ADI's Tier 1 and Total Capital requirements.

Appendix 1 Regulatory Capital Reconciliation

continued

1.2 Regulatory Balance Sheet as at 31 March 2021

	Macquarie Bank Group Consolidated ⁽¹⁾ \$m	Adjustment ⁽²⁾ \$m	Level 2 Regulatory Balance Sheet \$m	Template/ Reconciliation Table Reference
Assets				
Cash and bank balances	15,966	(72)	15,894	
Cash collateral on securities borrowed and reverse repurchase agreements	34,555	–	34,555	
Trading assets	21,212	–	21,212	
Margin money and settlement assets	8,302	(16)	8,286	
Derivative assets	20,552	(8)	20,544	
Financial Investments	7,999	(2)	7,997	
Held for sale and other assets	3,066	(60)	3,006	
Loan assets	98,992	102	99,094	
Due from related body corporate entities	2,154	311	2,465	
Interests in associates and joint ventures	281	(12)	269	
Property, plant and equipment and right-of-use assets	2,797	(34)	2,763	
Intangible assets ⁽³⁾	146	(11)	135	Table b
Investment in regulatory non-consolidated subsidiaries	–	195	195	Table c (Footnote 2)
Deferred tax assets	826	(33)	793	Table a
Total Assets	216,848	360	217,208	
Liabilities				
Cash collateral on securities lent and repurchase agreements	4,542	1	4,543	
Trading liabilities	6,134	–	6,134	
Margin money and settlement liabilities	16,251	–	16,251	
Derivative liabilities	17,475	(109)	17,366	
Deposits	84,140	(2)	84,138	
Other liabilities	4,350	(238)	4,112	
Borrowings	2,473	1	2,474	
Due to related body corporate entities	15,901	703	16,604	
Debt issued	44,668	–	44,668	
Deferred tax liabilities	36	(1)	35	
Total Liabilities excluding loan capital	195,970	355	196,325	
Loan capital	6,804	–	6,804	Table d
Total liabilities	202,774	355	203,129	
Net Assets	14,074	5	14,079	
Equity				
Contributed equity	8,523	(2)	8,521	Table f
Reserves	306	(1)	305	Row 3
Retained earnings	5,245	8	5,253	Row 2
Total capital and reserves attributable to the ordinary equity holder of Macquarie Bank Limited	14,074	5	14,079	
Non-controlling Interests	–	–	–	Table g
Total equity	14,074	5	14,079	

⁽¹⁾ As per Macquarie Bank Limited financial report as at 31 March 2021.

⁽²⁾ Reflects the deconsolidation of certain subsidiaries for APRA reporting purposes. The subsidiaries which are deconsolidated for regulatory purposes include entities conducting insurance, funds management and non-financial operations. Assets and Liabilities of mortgage and leasing special purpose vehicles (SPV) where Macquarie has satisfied APS 120 Attachment A operational requirements for regulatory capital relief are not included in the Level 2 regulatory group.

⁽³⁾ The intangible component of investments in non-consolidated subsidiaries is included in intangible assets.

1.3 Reconciliation between Common Disclosures Template and Level 2 Regulatory Balance Sheet

Table a	31 March 2021 \$m	Template Reference
Deferred Tax Assets		
Total Deferred Tax Assets per Level 2 Regulatory Balance Sheet	793	
Less: Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability)	(32)	Row 10
Less: Deferred tax assets (temporary differences) – Amounts below prescribed threshold	(761)	Row 26e, 75
Total per Common Disclosure Template – Deferred Tax Asset – amount exceed 10%/15% threshold	–	Row 21 / 25

Table b	31 March 2021 \$m	Template Reference
Intangible Assets		
Total Intangible Assets as per Level 2 Regulatory Balance Sheet	135	
Less: capitalised software and other intangibles	(61)	Row 9
Less: intangible component of deconsolidated subsidiaries	(35)	Row 9
Total per Common Disclosure Template – Goodwill	39	Row 8

Table c	31 March 2021 \$m	Template Reference
Equity Investments		
Significant investment in financial entities ^{(1),(2)}	332	Row 73
Non-significant investment in financial entities ⁽¹⁾	57	Row 72
Total Investments in financial institutions	389	Row 26d
Investment in commercial entities ^{(1),(2)}	306	Row 26g
Total Equity Investments before applying prescribed threshold	695	
Less: amounts risk weighted under Harmonised Basel III guidelines	(695)	
Total per Common Disclosure Template – Equity Investments	–	Row 18, 19, 23

Table d	31 March 2021 \$m	Template Reference
Additional Tier 1 Capital		
Total Loan Capital per Level 2 Regulatory Balance Sheet	6,804	
Less: Accrued interest	(5)	
Add: Capitalised expenses deducted in Common Equity Tier 1 Capital ⁽³⁾	13	Included in Row 26f
Less: Fair value hedge adjustments ⁽⁴⁾	(67)	
Less: Tier 2 capital instruments reported in Table e	(5,117)	Table e
Additional Tier 1 Capital (MACS and BCN2)	1,628	
Less: Basel III transitional amortisation	–	
Total per Common Disclosure Template – Additional Tier 1 Capital	1,628	Row 36

⁽¹⁾ Equity Investments are classified in the Level 2 Regulatory Balance Sheet across Investments in Associates, Financial Investments and Investment in regulatory non-consolidated subsidiaries. In addition, the Level 2 regulatory group has undrawn commitments (off balance sheet) which are deemed in the nature of equity for Regulatory Capital purposes.

⁽²⁾ Included in significant investment in financial entities is \$161 million of equity investments in regulatory non-consolidated subsidiaries. Included in investment in commercial entities is \$34 million of equity investments in regulatory non-consolidated subsidiaries.

⁽³⁾ Unamortised issue cost relating to capital instruments are netted against each instrument on the Level 2 Regulatory Balance Sheet. For regulatory capital purposes, the unamortised costs are deducted at CET1 as part of capitalised expenses in row 26f of the Common Disclosures Template.

⁽⁴⁾ For regulatory capital purposes, APRA requires these instruments to be included as if they were unhedged.

Appendix 1 Regulatory Capital Reconciliation

continued

Table d (continued)	31 March 2021 \$m	Template Reference
Additional Tier 1 Capital Instruments		
Macquarie Additional Capital Securities	987	
Macquarie Bank Capital Notes 2	641	
Total per Common Disclosure Template – Additional Tier 1 Capital	1,628	Row 36

Table e	31 March 2021 \$m	Template Reference
Total Tier 2 Capital per Balance Sheet		
Total Tier 2 Capital per Balance Sheet	5,117	Table d
Less: Accrued Interest	(66)	
Add: Capitalised expenses deducted in Common Equity Tier 1 Capital	16	Included in Row 26f
Less: Fair value hedge adjustments ⁽¹⁾	57	
Less: Basel III transitional amortisation	(912)	
Total per Common Disclosure Template – Tier 2 Capital	4,212	Row 46+47

Tier 2 Capital Instruments		
Subordinated Debt – USD1.0bn – eligible for transition	(172)	
2 Subordinated Debts – USD750m each – fully qualified Tier 2 instrument	(1,974)	
Subordinated Debt – AUD750m – fully qualified Tier 2 instrument	(750)	
Subordinated Debt – USD1.0bn – fully qualified Tier 2 instrument	(1,316)	
Total per Common Disclosure Template – Tier 2 Capital	(4,212)	Row 46+47

Table f	31 March 2021 \$m	Template Reference
Contributed Equity		
Total Contributed Equity as per Level 2 Regulatory Balance Sheet	8,521	
Add: Capitalised expenses deducted in Common Equity Tier 1 Capital	–	Included in Row 26f
Total per Common Disclosure Template – Contributed Equity	8,521	Row 1

⁽¹⁾ For regulatory capital purposes, APRA requires these instruments to be included as if they were unhedged.

Table g	31 March 2021 \$m	Template Reference
Non Controlling Interests		
Total Non Controlling Interests as per Level 2 Regulatory Balance Sheet	–	
Less: other non controlling interests not included in capital	–	
Total per Common Disclosure Template – Non Controlling Interests	–	Row 5

Table h

Countercyclical Capital Buffer

The Countercyclical Capital Buffer (CCyB) is an extension of the capital conservation buffer which must be held in the form of CET1 capital, ranging from 0 to 2.5%. The CCyB is designed to ensure that ADIs build up capital buffers when excess aggregate credit growth is judged to be associated with a build-up of system-wide risk. The CCyB is calculated as the weighted average of the jurisdictional buffers set by the relevant national authority where an ADI has private sector credit exposures, excluding exposures to Banks and Sovereigns.

	RWA \$m	Jurisdictional buffer	Countercyclical buffer requirement⁽¹⁾	Template Reference
Hong Kong	364	1.000%	0.0048%	
Luxembourg	313	0.500%	0.0021%	
Norway	57	1.000%	0.0008%	
Czech Republic	50	0.500%	0.0003%	
Slovakia	33	1.000%	0.0004%	
Bulgaria	1	0.500%	0.0000%	
Others	74,296	0.000%	0.0000%	
Total	75,114		0.0084%	Row 66

⁽¹⁾ Calculated as each country's share of total private sector credit exposures multiplied by the CCyB applicable to each country.

Appendix 2 List of Entities Deconsolidated from the Level 1 and Level 2 Regulatory Group for APRA Reporting Purposes

31 March 2021	Total Assets ^{(1),(2),(3),(4)}	Total Liabilities ^{(1),(2),(3),(4)}
Funds Management		
Bond Street Custodians Limited	17	–
Elise Nominees Pty Limited	–	–
Macquarie Australia Securities Pty Limited	1	–
Macquarie Fonds GmbH	–	–
Macquarie Fondsmanagement GmbH	1	(1)
Macquarie Global Bond Fund	–	–
Macquarie Investment Management Ltd	156	(6)
Macquarie Investment Services Limited	1	–
Macquarie Management GmbH	–	–
Macquarie Master Small Companies Fund	–	–
Macquarie NRAS Trust	–	–
Macquarie Prism Pty Limited	2	–
Macquarie Professional Series Global Equity Fund	–	–
Macquarie Securities Management Pty Limited	1	–
Macquarie Treuermögen GmbH	–	–
Macquarie Vermögenstreuhand GmbH	–	–
Non-Financial Operations		
Avenal Power Center, LLC	12	(10)
Capital Meters Limited	24	(15)
Comercializadora Energia de la Reforma S. de R.L. de C.V.	50	(46)
Corona Energy Limited	33	–
Corona Energy Retail 1 Limited	50	(31)
Corona Energy Retail 2 Limited	55	(29)
Corona Energy Retail 3 Limited	6	–
Corona Energy Retail 4 Limited	169	(156)
Corona Gas Management Limited	4	(2)
Ion Energy Pte. Limited	–	–
Liberty Green Renewables Indiana, LLC	3	(1)
Macquarie Business Solutions Pty Limited	–	–
Macquarie Commodities (Singapore) Pte. Limited	–	–
Macquarie Corona Energy Holdings Limited	21	(5)
Macquarie Electronics USA Inc	13	(7)
Macquarie Energy Services Pty Limited	14	(9)
Nu Mobile Pty Limited	6	(1)
Propertyiq Pty Limited	12	(2)
Propertyiq Strata Pty Limited	1	–
Pt Macquarie Commodities Indonesia	1	(1)
Resource Marine Pte. Limited	8	(1)

31 March 2021

Total Assets^{(1),(2),(3),(4)}

Total Liabilities^{(1),(2),(3),(4)}

Insurance

Macquarie (Bermuda) Limited

70

(67)

Macquarie Life Limited

43

(13)

⁽¹⁾ These balances, along with any Australian GAAP adjustment where required, are included in Macquarie Bank Group's audited Australian GAAP financial report for the year ended 31 March 2021. The financial report under local GAAP of certain entities may be subjected to separate audits from the Macquarie Bank Group audit and these audits may not be complete as at the date of this report.

⁽²⁾ The total assets and liabilities should not be aggregated as certain entities are holding companies for other entities in the table shown above.

⁽³⁾ Numbers are rounded to the nearest \$A million. Asset balances are shown as positive and liability balances are shown as negative.

⁽⁴⁾ The assets and liabilities for deconsolidated subsidiaries includes receivables from and payables to related entities.

Appendix 3 Annual Remuneration Disclosures

continued

Introduction

This document has been prepared in accordance with the Australian Prudential Regulatory Authority (APRA) Prudential Standard APS 330 Public Disclosure (APS 330) for Authorised Deposit-taking Institutions (ADIs). The remuneration disclosures presented herein for the financial years ended 31 March 2021 and 31 March 2020 of Macquarie Bank Limited (MBL or Macquarie Bank) are separate to the requirements of the Corporations Act 2001 (Cth) and may not be comparable to other information disclosed by MBL.

Macquarie Bank is a subsidiary of the Macquarie Group, and the Non-Executive Directors (NEDs) are common to both the Board and the MGL Board (the Boards). Whilst subject to the remuneration framework determined by the Macquarie Group, the Board considers remuneration recommendations relating to the senior executives of Macquarie Bank. Throughout this disclosure document, for consistency, references are made to the Macquarie Group's remuneration arrangements rather than Macquarie Bank's remuneration arrangements.

The qualitative remuneration disclosures (sections 1 to 4) outline the remuneration framework consistent with the Macquarie Group's Remuneration Policy. Macquarie Group's Remuneration Policy applies to all employees globally. The quantitative information (section 5) relates to senior managers and material risk takers of MBL for the financial years ended 31 March 2021 and 31 March 2020. The Board Remuneration Committee (the BRC or the Committee) assists the Board in identifying the following groups of employees as senior managers and material risk takers as defined in paragraph 21 of APS 330 for the financial years ended 31 March 2021 and 31 March 2020 respectively:

Roles	Number of individuals	
	2021	2020
Senior managers the MBL Executive Committee ⁽¹⁾	7	8
Material risk takers Executive Directors who are MBL Designated Executive Directors ⁽²⁾	36	26

⁽¹⁾ These individuals will be referred to as either senior managers or Executive Committee members throughout this document.

⁽²⁾ Executive Directors who have a significant management or risk responsibility in the organisation. These individuals will be referred to as either material risk takers (MRTs) or Designated Executive Directors (Designated EDs) throughout this document.

For FY2021, the number of material risk takers for MBL has increased to be brought in line with the proposed requirements of the draft APRA Prudential Standard CPS 511 (pending final release).

1 Remuneration Governance

The MGL Board oversees the Macquarie Group's remuneration framework. The MGL Board has a BRC whose objective is to assist the Board and the Board of Macquarie Bank, a key operating subsidiary, with the Macquarie Group's remuneration policies and practices.

The BRC currently comprises five independent Non-Executive Directors (NEDs):

Board Remuneration Committee members

Jillian Broadbent ⁽¹⁾	Chair
Michael Hawker ⁽²⁾	Chairman
Gary Banks ⁽³⁾	Member
Gordon Cairns ⁽⁴⁾	Member
Philip Coffey	Member
Diane Grady	Member
Mike Roche ⁽⁵⁾	Member
Peter Warne	Member

The BRC members have the required experience and expertise in human resources, remuneration and risk to enable them to achieve effective governance of the Macquarie Group's remuneration framework. The BRC has a regular meeting cycle and met six times during FY2021. Strict processes are in place to ensure conflicts of interest are appropriately managed.

The BRC pays close attention to the design and operation of remuneration practices for all of the Macquarie Group, not just for the most senior executives. The responsibilities of the BRC are outlined in its Charter, which is reviewed and approved annually by the Board. Some of the responsibilities include:

- overseeing the process for the annual review of the CEOs' and other Executive KMPs' performance by the Macquarie Group and Macquarie Bank Boards
- recommending to the Board the remuneration outcomes for all Executive KMP, Designated Executive Directors and other senior executives
- assessing the effectiveness of the *Remuneration Policy* to ensure compliance with legal and regulatory requirements, as well as to support the alignment of remuneration with prudent risk-taking and professional conduct across the organisation
- recommending the *Remuneration Policy* to the Board for approval.

Macquarie Group's strong remuneration governance framework provides the BRC with multiple opportunities to review and challenge both individual remuneration outcomes and the company-wide profit share pool. There is a consistent and comprehensive process for the BRC to assess performance and determine remuneration outcomes for Macquarie Bank's most senior staff.

The BRC has retained Pay Governance as its independent remuneration consultant, for the use of the Board to obtain advice on the appropriateness of Macquarie Group's remuneration framework.

The only service that Pay Governance provides to Macquarie Group is executive compensation consulting to the BRC. Pay Governance has not made any remuneration recommendations, as defined by the Corporations Act 2001 (Cth) (the Act). The BRC is responsible for making decisions within the terms of its Charter. Pay Governance's terms of engagement set out their independence from members of Macquarie Group's management. This year, Pay Governance:

- provided information on global remuneration and regulatory trends
- considered alignment with shareholder interests
- compared individual remuneration for Executive KMP where relevant comparator company information was available
- considered Macquarie Group's overall remuneration approach compared to comparator company organisations.

Board and Committee fees are reviewed annually. Per diem fees may also be paid from time to time for approved additional work. Macquarie Group's NEDs are remunerated for their services from the maximum aggregate amount approved for this purpose. MGL shareholders approved the current limit (\$A5.0 million per annum) at MGL's 2019 Annual General Meeting. The Board ensures that NED remuneration for MGL and MBL taken together does not exceed this shareholder approved maximum amount. An internal review of NED fees was completed during the year. The Boards determined, following this review, that Board and Committee fees should remain unchanged, with the Chairman receiving an annual fee of \$A267,000 and each Board member receiving an annual fee of \$A78,000.

⁽¹⁾ Ms Broadbent was appointed as Chair of the BRC effective 1 September 2020.

⁽²⁾ Mr Hawker ceased to be a member of the MGL and MBL Boards effective 30 September 2020.

⁽³⁾ Mr Banks ceased to be a member of the MGL and MBL Boards effective 30 July 2020.

⁽⁴⁾ Mr Cairns ceased to be a member of the MGL and MBL Boards effective 7 May 2021.

⁽⁵⁾ Mr Roche was appointed to the MGL and MBL Boards effective 20 January 2021. He was appointed as a member of the BRC effective 1 February 2021.

Appendix 3 Annual Remuneration Disclosures

continued

2 Remuneration Design and Structure

Macquarie Group’s longstanding and consistent approach to remuneration continues to support our remuneration objectives, including delivering strong company performance over the short and long-term, while prudently managing risk and reinforcing the *Code of Conduct* and *What We Stand For*. The Macquarie Group Limited Board recognises that to achieve these objectives, we must attract, motivate and retain exceptional people with deep industry expertise while aligning their interests with shareholders to meet the needs of clients and customers while ensuring that regulatory requirements are upheld. This broad approach has been in place since Macquarie Group’s inception, evolving over time to ensure the framework continues to meet our remuneration objectives.






Macquarie Group’s remuneration approach has been a key driver of our sustained success as an international organisation. Staff are motivated to grow businesses over the medium to long-term, taking accountability for all decisions and their accompanying risk management, customer, economic and reputational consequences.

This approach has been fundamental in ensuring we can continue to attract, motivate and retain exceptional, entrepreneurial and ethical people across the global markets in which we operate. We hire world-class people in 32 highly competitive markets. These people come from, and compete in, various industry sectors (including hedge funds, private equity firms, global investment banks, fund managers, advisory boutiques, commodity houses and other banks, as well as industries that are not specific to banking or financial services, for example, technology, accounting and engineering) across many jurisdictions.

The table below shows the link between Macquarie Group’s purpose and the remuneration objectives and principles.

<p>Macquarie Group’s purpose:</p> <h2>Empowering people to innovate and invest for a better future</h2>		
 Opportunity	 Accountability	 Integrity
 Remuneration objectives	 Remuneration principles	
<p>Macquarie Group’s remuneration framework aims to:</p> <ul style="list-style-type: none"> – deliver strong company performance over the short and long-term whilst prudently managing risk – attract, motivate and retain exceptional people with deep industry expertise – align the interests of staff and shareholders to deliver sustained results for our customers, clients and community – promote innovation and the building of sustainable businesses – drive behaviours that reflect Macquarie Group’s culture and the principles of What We Stand For – foster a diverse and inclusive work environment. 	<p>These objectives are achieved by:</p> <ul style="list-style-type: none"> – emphasising performance-based remuneration – determining an individual’s variable remuneration based on a range of financial and non-financial factors – retaining a significant proportion of performance-based remuneration to enable risk outcomes to be considered over a long period – delivering retained profit share in equity to ensure the interests of staff and shareholders are aligned over the long-term – remunerating high-performing staff appropriately, relative to global peers – providing consistent arrangements over time to give staff the confidence to pursue multi-year initiatives. 	

Macquarie Group's remuneration framework works as an integrated whole. As summarised below, an individual's remuneration comprises fixed remuneration, profit share and, for Executive committee members (our Executive KMP), Performance Share Units (PSUs).

Remuneration framework		
Fixed Remuneration		
		<ul style="list-style-type: none"> – primarily comprises base salary, as well as superannuation contributions and standard country-specific benefits in line with local market practice – for Executive KMP, is set at a comparatively low level, relative to the industry, and a low proportion of total remuneration but sufficient to avoid inappropriate risk-taking – is reviewed annually and reflects technical and functional expertise, role scope, market practice and regulatory requirements – for risk and financial control staff, is generally a higher proportion of total remuneration than for front office staff.
Performance-based Remuneration		
Criteria	Profit Share	Performance Share Units
 Eligibility	– all permanent employees	– Executive Committee members
 Determination	<ul style="list-style-type: none"> – allocations reflect an individual's performance, which is assessed against a range of financial and non-financial factors including: <ul style="list-style-type: none"> – contribution to financial results – approach to risk management and compliance – business leadership including outcomes for customers and the community – people leadership and professional conduct including the role-modelling of Macquarie Group's culture and purpose 	<ul style="list-style-type: none"> – PSU pool is determined with reference to profits over recent years, subject to Board discretion. – individual allocations reflect their role as members of the Executive Committee and their contribution to driving the collective performance of Macquarie – for FY2021, allocations are based on the face value of shares on the grant date
 Structure	<ul style="list-style-type: none"> – significant proportion is retained (80% for the MGL CEO and 60% for the MBL CEO). – long deferral periods (up to seven years for the MGL and MBL CEOs). – retained profit share is delivered in a combination of MGL equity and Macquarie-managed fund equity 	<ul style="list-style-type: none"> – PSUs vest after four years, subject to the achievement of two forward-looking performance hurdles (no retesting of hurdles) – PSUs are structured as DSUs⁽⁶⁾ with no exercise price – no right to dividend equivalent payments
 Malus	– applies for senior employees	– applies to all awards
 Forfeiture	– retained profit share is subject to forfeiture upon leaving Macquarie Group except in certain circumstances.	– unvested PSUs are subject to forfeiture upon leaving Macquarie Group except in certain circumstances.

The MGL Board has discretion to change remuneration arrangements on an annual basis to meet changing market conditions as well as to comply with regulatory and corporate governance developments.

⁽⁶⁾ A DSU is a Deferred Share Unit and is an award type under the MEREP. For further details, refer to Note 31 to the financial statements in the Financial Report.

Appendix 3 Annual Remuneration Disclosures

continued

2.1 Risk and Financial Control Personnel

The Boards and management seek to ensure that remuneration for risk and financial control personnel, including the Chief Financial Officer (CFO), the Chief Risk Officer (CRO) and the Group General Counsel, is structured so that it does not compromise the independence of these personnel in carrying out their functions and is determined in a way that maintains Macquarie's robust risk management framework.

The proportion of fixed compensation for risk and financial control staff is generally higher than for other staff, with profit share allocations being less variable than those awarded to staff performing front office functions. The CRO, CFO and Group General Counsel are each responsible for reviewing the remuneration of all staff across Macquarie whose primary role is risk and financial control and for alerting the BRC to any pay discrepancies. Each of the CRO, CFO and General Counsel provide written confirmation to the BRC each year that remuneration for such staff has been determined in such a way that preserves the independence of the function and maintains Macquarie's robust risk management framework.

3 Culture, accountability and remuneration

Risk culture

Macquarie Group's *What We Stand For* principles of Opportunity, Accountability and Integrity remain pivotal to our culture and effectively guide our staff in balancing risk and reward and making decisions that realise opportunity for the benefit of our clients, our shareholders, our people and the communities in which we operate. Staff are continually made aware that these principles must form the basis of all behaviours and actions. These behavioural expectations are outlined in the MGL Board approved *Code of Conduct*, which is actively promoted by Management and cascaded through the organisation through multiple mechanisms. Macquarie Group invests significant time and effort into communicating and reinforcing Macquarie Group's culture through communications from senior management, policy reminders, training, and learning and development activities. The Board is able to assess Macquarie's culture in a number of ways including through staff survey results, human capital reporting, risk culture reports, consequence management reports, strategy presentations as well as through personal observation of management, and staff behaviour and actions.

Strong risk management is a fundamental part of everyone's role at Macquarie Group. Staff understand that they are rewarded not just for their contribution to financial results, but also for how those results are achieved. This includes an assessment of an individual's approach to managing risk, and their alignment to the *What We Stand For* principles. They understand there are potential consequences for non-compliance with the risk management framework and Macquarie Group's behavioural expectations. Staff training and communications emphasise the link between risk, conduct, policy breaches and consequence management outcomes, including, where appropriate, adjustments to performance-based remuneration.

Alignment of remuneration with risk outcomes

The Board considers that the effective alignment of remuneration with prudent risk-taking is fundamental to its remuneration approach. The consideration of risk is embedded throughout the entire remuneration process including through the determination of individual profit share allocations, business and company-wide profit share pools as well as through the way in which remuneration is structured and delivered.

The Board is aware of the increasing focus of regulators and shareholders on ensuring that risk-related matters that come to light subsequent to remuneration being awarded are appropriately factored into remuneration decisions. Macquarie Group's high retention rates and long deferral periods provide a mechanism for the Board to consider risk outcomes over a long period. Furthermore, where an investigation has commenced into a risk or conduct-related matter that may result in forfeiture or, for senior employees, the application of Malus, Macquarie may further defer the payment, vesting and/or release of profit share to allow for the investigation to be completed.⁽⁷⁾

⁽⁷⁾ Malus also applies to any unvested profit share retained by Executive Directors on termination, in addition to the Post Employment Events.

The following mechanisms exist to risk adjust remuneration outcomes:

In-year profit share adjustments	Applies to all staff
<ul style="list-style-type: none">– determined as part of assessing an individual's performance each year– the annual assessment includes consideration of compliance with the risk management framework and with the behavioural expectations outlined in the Code of Conduct. In addition, any outcomes from the consequence management process or the independent reporting from the Chief Risk Officer (CRO) and General Counsel are also considered.	
Forfeiture	Applies to all staff with retained profit share
<ul style="list-style-type: none">– where an individual's employment is terminated due to a compliance or conduct concern (or they resign), unvested remuneration is forfeited, as per Macquarie's standard policy.	
Malus Events	Applies to senior employees
<p>Macquarie Group's Malus provisions provide the MGL Board or its delegate with the ability to reduce or eliminate in full, the retained profit share for senior employees and, for Executive Committee members, unvested PSUs where it is determined that the individual has at any time:</p> <ul style="list-style-type: none">– acted dishonestly (including, but not limited to, misappropriating funds or deliberately concealing a transaction)– acted or failed to act in a way that contributed to:<ul style="list-style-type: none">– a breach of a significant legal or significant regulatory requirement relevant to the Macquarie Group– MGL or Macquarie Bank making a material financial restatement– MGL, MBL or any Operating Group within the Macquarie Group incurring:<ul style="list-style-type: none">– significant reputational harm– a significant unexpected financial loss, impairment charge, cost or provision.	

Additional provisions may apply to staff in certain jurisdictions to ensure compliance with local regulations. This includes, for example:

- If an Accountable Person fails to comply with their accountability obligations under the BEAR, this may result in consequences being applied in accordance with Macquarie Group's policies, including the application of Malus
- Staff in the UK and EU who are subject to additional Malus and clawback provisions under local regulatory requirements.

The BRC considers whether, and the extent to which, to apply Malus, taking into account local employment laws, the nature and circumstances of the event and any other redress that has been or may be applied.

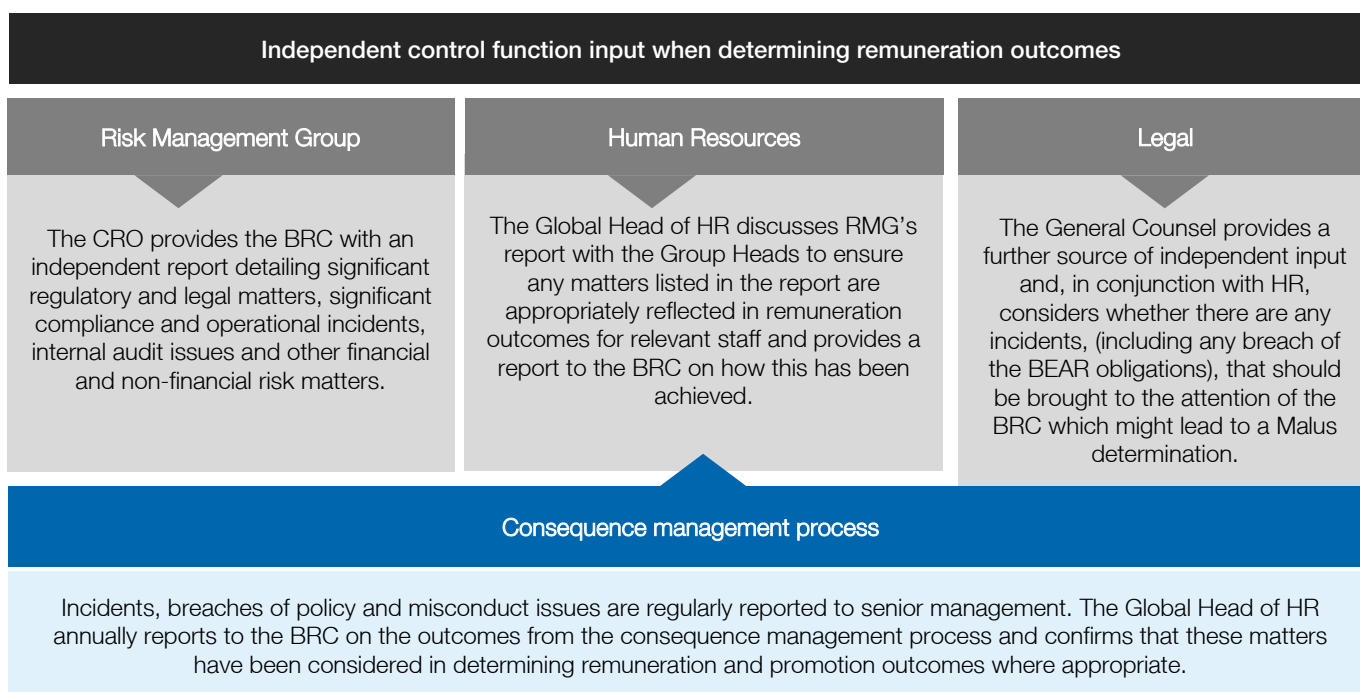
Macquarie Bank has always had and continues to have, the ability to terminate staff where a Malus Event has occurred, at which time any unvested profit share would be forfeited in full.

Appendix 3 Annual Remuneration Disclosures continued

Risk adjustment processes

There are robust processes in place to ensure that all risk, reputation, and conduct-related matters are specifically considered when determining remuneration outcomes. These processes may result in a downward adjustment to group and/or individual profit share allocations where appropriate. A wide range of risks that could have a financial or non-financial impact on Macquarie Bank are considered, including if there has been a detriment to customers.

The diagram below provides an overview of these processes.



Consequence management outcomes

Macquarie Group's Consequence Management Guideline applies wherever a breach of internal policy or regulatory requirement is identified. Consequences may include further training, removal of delegated authorities or permissions, adjustments to performance-based remuneration, impact on promotion, formal warnings or termination.

Where an employee has received a formal warning, their performance-based remuneration will likely be impacted and in some cases, it will be reduced to zero. Promotion decisions may also be impacted. Consequences may also be applied where a formal warning has not been issued. In each case, judgement is exercised as to the appropriate consequence(s) based on all the relevant circumstances.

In FY2021, for Macquarie Bank, there were 81 (FY2020: 79) matters involving conduct or policy breaches (for example, *Code of Conduct*, appropriate workplace behaviour, risk management and technology breaches) that resulted in formal consequences. Of those:



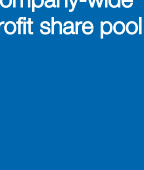
- for 15 matters, termination of employment was the outcome (FY2020: 15)
- for 66 matters, a formal warning was issued (FY2020: 64). Additional consequences were applied as appropriate including additional training, removal of delegated authorities or permissions, adjustments to profit share and/or impact to promotion. Of the 66 matters, 13 resulted in individuals subsequently leaving Macquarie Bank before year-end outcomes were determined and 52 individuals had their profit share reduced by an average of 49%.

The overall number of matters is broadly in line with the prior year, despite a significant increase in headcount as a result of the transfer to MBL of entities employing Macquarie Group's shared service staff during the year. The remote working environment also impacted the number of matters this year. For example, fewer in-person interactions contributed to a reduction in instances of conduct failing to meet appropriate workplace behaviour standards.

The 81 matters were considered isolated incidents and there was no evidence of broader systemic conduct issues.

4 Annual process to determine profit share outcomes

Remuneration outcomes are based on realised outcomes, which are determined through a principles-based approach, taking into consideration all aspects of an individual's performance. Significant judgement is applied in determining remuneration outcomes to ensure that all factors that may potentially impact the quantum of profit share allocations are considered. The table below describes how profit share allocations are determined at an individual, business group and company-wide level. Outcomes may be adjusted downwards at any level as a result of any risk management, compliance and conduct issues that have come to light during the year.

<p>Individual profit share allocations</p> 	<p>Individual profit share allocations reflect an employee's performance. Employees are assessed against the following areas:</p> <p>Financial Results</p> <ul style="list-style-type: none"> – business profits and individual contribution to profits for front office staff – primarily based on contribution to high quality control functions for risk and financial control roles – for other support staff, based on their contribution to delivering high quality services to support the businesses <p>Risk management and compliance</p> <ul style="list-style-type: none"> – an assessment of an individual's approach to managing financial and non-financial risks – motivates a culture of disciplined risk management, and regulatory, policy and business compliance <p>Business leadership (including customer and community outcomes)</p> <ul style="list-style-type: none"> – business growth and innovation – delivering solutions for our customers and the communities in which we operate <p>People leadership and professional conduct</p> <ul style="list-style-type: none"> – alignment to Macquarie Group's purpose and culture – conduct and behaviour consistent with the <i>Code of Conduct</i> and <i>What We Stand For</i> – fostering a diverse and inclusive work environment – talent development <p>Individual profit share allocations also consider relativities in the market in which each business competes for talent.</p>
<p>Business group profit share pools</p> 	<ul style="list-style-type: none"> – for Operating Groups reflects consideration of: <ul style="list-style-type: none"> – each business' contribution to company-wide profits – each business' capital, funding and liquidity requirements and usage – other factors such as the quality of the income, whether the business is highly regulated or not, the maturity of the business, and the reliance on intellectual capital versus financial capital – for Central Service Groups, based on the quality and integrity of control functions and support services; not primarily determined with reference to profitability – considers the risk profile of each business including consideration of any significant reputational, cultural or compliance matters – also considers overall remuneration levels in the market in which each business operates
<p>Company-wide profit share pool</p> 	<ul style="list-style-type: none"> – is an aggregate of the bottom-up assessment conducted at both the business and individual level – is assessed for overall reasonableness, including consideration of: <ul style="list-style-type: none"> – an internal reference based on Macquarie Group's after-tax profits and its earnings over and above the estimated cost of capital – the resultant compensation expense to income ratio and how it compares to that of peers – the Board retains discretion to amend the final pool determined in accordance with the bottom-up assessment to ensure that all relevant factors, including risk and conduct matters, have been appropriately taken into consideration. For the seventh year in a row, the company-wide pool is substantially below the internal reference described above. – the Chief Financial Officer (CFO) confirms that the profit share pool can be supported by Macquarie Group's capital position and does not limit Macquarie Group's ability to further strengthen its capital base in the future.

Appendix 3 Annual Remuneration Disclosures

continued

FY2021 remuneration impacts – APRA enforcement action

On 1 April 2021, APRA announced actions required regarding MBL's risk management practices and ability to calculate and report key prudential ratios. APRA increased MBL's operational risk capital requirement and made adjustments to requirements for certain liquidity prudential ratios, effective from 1 April 2021. The actions relate to specific intra-group funding arrangements as well as breaches of APRA's reporting standards on liquidity between 2018 and 2020. APRA noted that the breaches are historical and do not impact the current overall soundness of Macquarie Group's capital and liquidity positions.

The Board acknowledges the seriousness of the APRA findings and has reflected this in its determination of remuneration outcomes. This has been through a reduction in the PSU allocations for Executive KMP and the imposition of additional qualifying conditions on the release of a portion of their retained profit share. The qualifying conditions relate to the timely and satisfactory remediation of the APRA findings.

4.1 Retained profit share: retention and vesting

Macquarie Group retains a percentage of each individuals' annual profit share allocation (retained profit share) above certain thresholds, which is invested in a combination of MGL ordinary shares under the Macquarie Group Employee Retained Equity Plan (MEREPE) and Macquarie-managed fund equity notionally invested under the Directors' Profit Share (DPS) Plan.⁽⁸⁾ Whilst they are employed, an individual's retained profit share vests and is released over a period that reflects the scope and nature of their role and responsibilities.⁽⁹⁾ These arrangements ensure that Macquarie Group continues to retain high-performing staff, provide significant long-term alignment to shareholders and customers as well as enabling risk outcomes to be considered over long periods.

Retention and vesting arrangements are determined by the Board Remuneration Committee (BRC), according to prevailing market conditions, remuneration trends, and compliance with regulatory requirements (including under the Banking Executive Accountability Regime (BEAR)). For each year's allocation, once the vesting period has been determined it remains fixed for that allocation.

As noted in last year's Remuneration Report, in light of the economic uncertainty due to COVID-19, retention rates in FY2020 were increased to 100% for the MBL CEO and all Executive Committee members (no cash component). For FY2021, to reflect improved economic conditions, the Board has determined that retention rates be reset to levels more in line with 2019. The following table summarises the standard retention and vesting arrangements applicable for FY2021.

FY2021 standard profit share retention and vesting arrangements

Role	Profit share retention (%)	Vesting and release of profit share ⁽¹⁰⁾
CEO Macquarie Group	80	
CEO Macquarie Bank	60	One-fifth in each of years 3–7
Executive Committee members	60	
Designated Executive Directors ⁽¹¹⁾	50–60	
Executive Directors	40–60	One-third in each of years 3–5
Staff other than Executive Directors	25–60 ⁽¹²⁾	One-third in each of years 2–4

The MGL Board's discretion to change remuneration arrangements, as noted above, includes changes to profit share retention levels provided that the retention percentage is at least 30% for all Executive Directors.

⁽⁸⁾ Both the MEREPE and DPS Plan are fundamental tools in Macquarie's retention, alignment and risk management strategies, encompassing both long-term retention arrangements and equity holding requirements. The MEREPE has a flexible plan structure that offers different types of equity grants depending on the jurisdiction in which the participating employees are based. In most cases, the equity grants are in the form of units comprising a beneficial interest in MGL ordinary shares held in a trust for the staff member (Restricted Share Units or RSUs). For further details on the MEREPE, refer to [Note 31] *Employee equity participation* to the financial statements in the Financial Report. The DPS Plan comprises exposure to a notional portfolio of Macquarie managed funds. Retained amounts are notionally invested over the retention period. This investment is described as 'notional' because Executive Directors do not directly hold securities in relation to this investment.

⁽⁹⁾ Profit share that is not retained ("available profit share") is delivered in cash except for staff subject to the UK Remuneration Code implementing CRD IV, where 50% of available profit share is delivered in Macquarie equity and is subject to a 12-month hold period.

⁽¹⁰⁾ For staff subject to the UK Remuneration Code implementing CRD IV, retained profit share invested in Macquarie Group equity is subject to a further 12-month hold post the vesting period.

⁽¹¹⁾ Executive Directors who have a significant management or risk responsibility in the organisation.

⁽¹²⁾ Above certain monetary thresholds.

Investment of retained profit share

An individual's retained profit share is invested in a combination of MGL ordinary shares under the MEREP and Macquarie-managed fund equity notionally invested under the DPS Plan. The allocation reflects the nature of their role as set out in the following table.

FY2021 Standard investment of retained profit share

Role	Retained profit share investment	
	MEREP (MGL ordinary shares) %	DPS Plan (Macquarie-managed fund equity) %
CEOs of MGL and MBL	90	10
Executive Committee members	80–90	10–20
Executive Directors	80–100 ⁽¹³⁾	0–20
Staff other than Executive Directors	100 ⁽¹⁴⁾	0 ⁽¹⁴⁾

In addition to the arrangements set out in the table above, different arrangements may apply in certain circumstances:

- retention rates, vesting and release schedules may vary for certain groups of staff who have become employees as a result of an acquisition, or for staff in certain jurisdictions, for example in the UK or European Union (EU), to ensure compliance with local regulatory requirements
- in limited circumstances, retained profit share may be allocated under arrangements other than the DPS Plan or the MEREP. For example, this may include investment in funds or products of a specific business group where there is a need to directly align the interests of staff with those of their clients.

4.2 Forfeiture of retained profit share – Malus and Clawback

The Board or its delegate has the ability to reduce or eliminate unvested profit share for certain senior employees in certain circumstances (Malus). For certain employees identified in the UK or EU, the Board also has the ability to recover (in whole or in part) vested profit share (Clawback).

4.3 Early vesting and release of retained profit share

The standard policy is that staff who cease employment with Macquarie Group will forfeit their unvested retained profit share. The Board may exercise discretion to accelerate the vesting of a departing employee's retained profit share and reduce the retention period including where, for example, their employment ends in the case of retirement from Macquarie Group, redundancy, death, serious incapacitation, disability, or serious ill-health. The Board's discretion to accelerate the vesting of retained profit share under these circumstances is subject to the conditions of early release as set out below for Executive Directors.

Discretion may be exercised in certain other limited exceptional circumstances on the grounds of business efficacy, in relation to strategic business objectives, including in connection with the divestment or internalisation of Macquarie Group businesses, or when an employee resigns to fulfil a public service role in a governmental organisation or agency. Where such discretion is exercised, the Board may impose such other conditions as it considers appropriate. This year, such discretion has been exercised and retained profit share was approved to be released on original vesting schedule for one executive due to the transfer of their employment to a joint venture entity.

⁽¹³⁾ For Executive Directors subject to the UK Remuneration Code implementing CRD IV, retained profit share is invested 60% in Macquarie Group equity and 40% in the DPS Plan.

⁽¹⁴⁾ For staff other than Executive Directors, retained profit share is generally invested in Macquarie Group equity with the exception of those staff with funds responsibilities where retained profit share is invested in a combination of Macquarie equity and Macquarie-managed fund equity.

Appendix 3 Annual Remuneration Disclosures

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4.3.1 Conditions of early release to departing Executive Directors – Post Employment Events

Where discretion has been exercised to accelerate the vesting of retained profit share, the Board may reduce or eliminate their retained profit share, if it is determined that the Executive Director has at any time during their employment or the relevant release periods after their employment committed a Malus Event (as set out on page 85) or:

- (a) taken staff to a competitor of Macquarie Group or been instrumental in causing staff to go to a competitor, or
- (b) joined a competitor of Macquarie Group or otherwise participated in a business that competes with Macquarie Group.

Each of the above is a Post Employment Event.

In the case of death or serious incapacitation, the Board will typically accelerate the vesting of retained profit share and immediately release it. In other circumstances, the release will occur over the period from six months to two years after the Executive Director leaves, in accordance with the following table:

	First Period	Second Period	Third Period
Time post-departure	Six months	Six months to one year	One year to two years
Unvested retained profit share released	From all but the last two years of employment	From the second year prior to the end of employment	From the year prior to the end of employment
Subject to	No Malus Event or Post Employment Event as set out previously	No Malus Event or Post Employment Event during the First Period, and	No Malus Event or Post Employment Event during the First Period, and
		No Malus Event or Post Employment Event (a) above during Second Period	No Malus Event or Post Employment Event (a) during the Second Period, and
			No Malus Event during the Third Period
Where the release is by reason of retirement from Macquarie Group	As above	As above and in addition, the release is subject to no Post Employment Event (b) during the Second Period	As above and in addition, the release is subject to no Post Employment Event (b) during the Second or Third Period

In addition to the above, for Accountable Persons, the exercise of discretion for any early release of retained profit share will be subject to Macquarie Bank meeting the minimum deferral periods required under the BEAR.

Where an Executive Director has a tax liability on termination of employment in respect of any unvested retained profit share, the Boards or its delegates have discretion to release unvested retained profit share up to an amount equal to the Executive Director's tax liability, at an earlier time than noted above.

4.4 Performance Share Units (PSUs)

Allocation and structure

Executive Committee members are the only group of staff eligible to receive PSUs, which are subject to forward-looking performance hurdles and determined with reference to Macquarie Group's performance as a whole. As such, they provide an additional incentive to Executive Committee members to drive company-wide performance over the long-term and beyond their business group responsibilities. PSU awards are a meaningful incentive but are generally not the major element of an Executive Committee member's total remuneration.

While the PSU pool is determined with reference to profits over recent years, the MGL Board retains discretion to determine the final PSU pool taking into consideration both financial and non-financial factors, including the risk profile of the Macquarie Group.

Individual allocations are based on their role as members of the Executive Committee and their contribution to driving the collective performance of Macquarie Group, including their collaboration across businesses.

PSUs are granted in August each year. The number of PSUs that will be allocated will be calculated by dividing the face value of the award by the price of MGL ordinary shares on or around the date of grant.

Since their introduction, PSUs have been structured as DSUs with performance hurdles. Holders have no right to dividend equivalent payments. There is no exercise price for PSUs.

4.4.1 Performance Hurdles for PSUs

Performance hurdles

The following summarises the key terms of PSUs and the performance hurdles:

	EPS CAGR hurdle	ROE hurdle
Application	50% of PSU award	50% of PSU award
Performance measure	Compound annual growth rate (CAGR) in EPS over the vesting period (four years) ⁽¹⁵⁾	Average annual ROE over the vesting period (four years) ⁽¹⁵⁾ relative to a reference group of global financial institutions ⁽¹⁶⁾
Hurdle	Sliding scale applies: <ul style="list-style-type: none"> – 50% becoming exercisable at EPS CAGR of 7.5% – 100% at EPS CAGR of 12% For example, if EPS CAGR was 9.75%, 75% of the relevant awards would become exercisable	Sliding scale applies: <ul style="list-style-type: none"> – 50% becoming exercisable above the 50th percentile – 100% at the 75th percentile For example, if ROE achievement was at the 60 th percentile, 70% of the relevant awards would become exercisable
Forfeiture	<ul style="list-style-type: none"> – Malus provisions apply – the standard policy is that unvested PSUs will be forfeited upon termination – in the case of retirement from Macquarie Group, redundancy, death, serious incapacitation, disability, serious ill-health or other limited exceptional circumstances, the Board or the BRC has the authority to either accelerate the vesting of PSUs or to permit the PSUs to continue to vest in accordance with the original award schedule and remain subject to the same performance hurdles – should a change of control occur⁽¹⁷⁾ the Board or the BRC has discretion to determine how unvested PSUs should be treated, having regard to factors such as the length of time elapsed in the performance period, the level of performance to date and the circumstances of the change in control. 	

⁽¹⁵⁾ PSUs awarded prior to FY2020 vested in two equal tranches after three and four years.

⁽¹⁶⁾ The reference group for awards is Bank of America Corporation, Barclays PLC, Credit Suisse Group AG, Deutsche Bank AG, Goldman Sachs Group Inc., JP Morgan Chase & Co., Lazard Ltd, Morgan Stanley and UBS AG. Comparator company information is presented in the same order throughout the Remuneration Report.

⁽¹⁷⁾ Under the MEREP Plan Rules, a change in control occurs where a person acquires or ceases to hold a relevant interest in more than 30% of MGL shares or where the Board resolves that a person is in a position to remove one-half or more of the Non-Executive Directors.

Appendix 3 Annual Remuneration Disclosures

continued

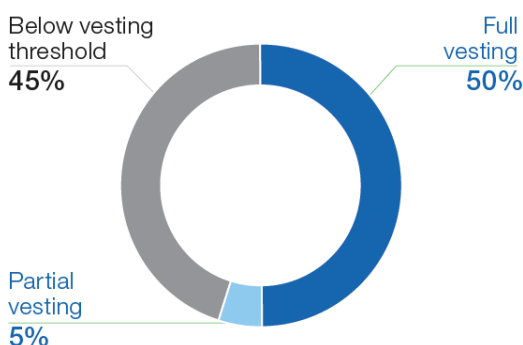
Rationale for hurdles

The PSU hurdles are regularly reviewed by the BRC to ensure they continue to align the interests of staff and shareholders and provide a challenging but meaningful incentive to Executive Committee members. The BRC considers historical and forecast market data, the views of corporate governance bodies, shareholders and regulators, as well as market practice. Both the relative ROE and absolute EPS hurdles were reviewed by the BRC during the year and were considered to still be appropriate. No change has been made to the hurdles for FY2021 for the following reasons:

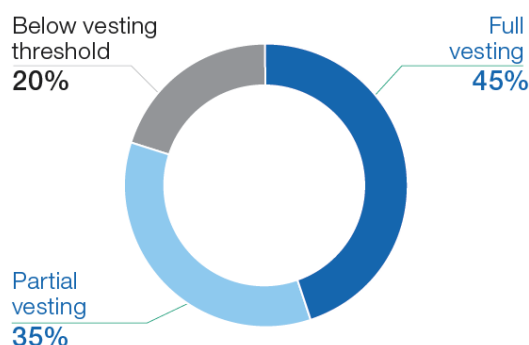
- ROE and EPS growth drive long-term shareholder value and are appropriate as the Executive Committee can affect outcomes on both measures. In contrast, Total Shareholder Return (TSR) is influenced by many external factors over which executives have limited control
- the approach is consistent with that advocated by APRA in not using TSR as a measure
- ROE and EPS can be substantiated using information that is disclosed in Macquarie Group's annual reports
- a sliding scale diversifies the risk of not achieving the hurdles and provides rewards proportionate to performance for shareholders and is preferable to an all-or-nothing test, which some have argued could promote excessive risk-taking
- the hurdles are designed to reward sustained strong performance and are relatively well-insulated from short-term fluctuations. The time frame used for PSUs should also be considered in light of the three- to seven-year deferral of profit share for members of the Executive Committee
- the EPS targets are confirmed as rigorous when market performance is considered, with the EPS threshold hurdle exceeding the performance of most of the ASX 20, global reference group and relevant indices over time
- for the EPS element to fully vest, Macquarie Group needs to achieve at least 12% CAGR over the vesting period. Supporting the rigour of the hurdle, cumulative EPS growth of 57% over four years is required to achieve full vesting
- the ROE vesting thresholds and sliding scale are in line with the domestic market and are particularly challenging when compared to international practice.

The charts below display Macquarie Group's historical EPS and ROE PSU outcomes, highlighting that since their introduction in 2009, 50% of the EPS tranches and 55% of the ROE tranches have resulted in either no vesting or partial vesting.

Historical EPS tranche outcomes



Historical ROE tranche outcomes



Use of an international reference group:

An international reference group⁽¹⁸⁾ recognises the extent of Macquarie Group's diversification and internationalisation. As at 31 March 2021, total international income represented approximately 68% of Macquarie Group's total income, with approximately 56% of Macquarie Group's staff located outside Australia. The BRC considers an international reference group to be appropriate on the basis that:

- the international reference group is currently most representative of Macquarie Group's business operations and talent pool. These firms broadly operate in the same markets and in similar business segments and compete for the same people as Macquarie Group.
- Macquarie Group has no comparable Australian-listed peers.

In addition, the BRC considers it important to not intervene reactively to remove under-performers or over-performers in any given period. An organisation's period of under-performance is generally followed by a period of over-performance.

⁽¹⁸⁾ The reference group is Bank of America Corporation, Barclays PLC, Credit Suisse Group AG, Deutsche Bank AG, Goldman Sachs Group Inc., JP Morgan Chase & Co., Lazard Ltd, Morgan Stanley and UBS AG. Comparator company information is presented in the same order throughout the Remuneration Report.

4.5 Other features of Macquarie Group’s remuneration framework

The following table summarises key features of Macquarie Group’s remuneration framework:

Role-based allowances	– Role-based allowances are a component of fixed remuneration which may be awarded to certain employees, including those identified as Material Risk Takers (MRTs) under UK or EU regulatory requirements. These allowances are determined based on the role and organisational responsibility of the individuals.
Minimum shareholding requirement	– Executive Directors are required to hold a relevant interest in MGL ordinary shares that have a value equal to 5% of an Executive Director’s aggregate profit share allocation for each of the past five years (10 years for Executive Committee members), which can be satisfied by the requirements of the profit share retention policy. – For Executive Committee members, compliance with this policy equates to a minimum shareholding requirement of between 195% to 780% of fixed remuneration.
Promotion Awards	– Staff who are promoted to Associate Director, Division Director or Executive Director receive an allocation of MEREP awards based on Director-level set with reference to an Australian dollar value. Currently these awards range from \$A25,000 to \$A175,000 depending on the promotion level.
Hedging	– Macquarie Group prohibits staff from hedging (i) shares held to meet the minimum shareholding requirement and (ii) unvested equity held in the MEREP.

Employment contracts

The following table summarises key features of the employment contracts for Executive Committee members including the CEO:

Length of contract	Permanent open-ended.
Remuneration review period	1 April to 31 March annually.
Profit share participation	Executive Committee members are eligible to be considered for a profit share allocation that ensures that a large part of their remuneration is ‘at risk’.
PSU participation	Executive Committee members are eligible to receive PSUs.
Termination of employment	Requires no more than four weeks’ notice by Macquarie Bank or the Executive Committee member (Post-employment restrictions apply). ⁽¹⁹⁾
Post-employment restrictions	Restrictions include non-solicitation provisions applicable for six months, and paid non-competition provisions applicable, at Macquarie Bank’s election, for up to three months post-termination.

⁽¹⁹⁾ Subject to compliance with local regulatory and legal requirements. In Australia, Executive Directors given notice by Macquarie Bank may receive an additional week’s notice if they are over 45 years of age and have more than two years’ continuous service at the time of the termination of their employment. In the UK, the statutory minimum notice period increases from 4 weeks to a maximum 12 weeks based on years of service.

Appendix 3 Annual Remuneration Disclosures

continued

5 Quantitative Disclosures for Senior Managers and Material Risk Takers

The following tables have been prepared in accordance with APS 330 for the financial years ended 31 March 2021 and 31 March 2020. These tables are prepared on a different basis than those required by Australian Accounting Standards and the Corporations Act, as disclosed in Macquarie Bank's Annual Report.

These disclosures reflect remuneration for services to MBL for the reporting period when the individual was a senior manager or material risk taker.

5.1 Total Value of Remuneration Awards for Senior Managers and Material Risk Takers⁽¹⁾

The following table sets out the total value of remuneration awarded to senior managers and material risk takers in respect of their performance for the financial years ended 31 March 2021 and 31 March 2020. 7 senior managers (FY2020: 7) and 36 material risk takers (FY2020: 25) received a variable remuneration award in respect of services to MBL in FY2021.

\$A'000	Senior managers				Material risk takers			
	Non-Deferred		Deferred		Non-Deferred		Deferred	
	2021	2020	2021	2020	2021	2020	2021	2020
Fixed remuneration⁽²⁾								
Cash-based	3,699	3,873	-	-	16,968	12,705	-	-
Shares and share-linked instruments	-	-	-	-	-	-	-	-
Other	-	-	-	-	-	-	-	-
Variable remuneration⁽³⁾								
Cash-based	19,684	-	-	-	40,364	19,116	-	-
Shares and share-linked instruments ⁽⁴⁾	-	-	41,344	55,908	778 ⁽⁵⁾	251 ⁽⁵⁾	42,349	30,049
Other	-	-	-	-	-	-	-	-

5.2 Deferred Remuneration for Senior Managers and Material Risk Takers – Total Value Outstanding, Vested and Any Downward Adjustments

The following table sets out the total value of deferred remuneration outstanding at 31 March 2021 and 31 March 2020 respectively, remuneration granted in previous years that vested during the current financial year and any realised reductions due to ex post explicit and implicit adjustments. All outstanding deferred remuneration is exposed to ex post explicit and implicit adjustments.

\$A'000	Senior managers		Material risk takers	
	2021	2020	2021	2020
Outstanding deferred remuneration⁽⁶⁾				
Cash-based	-	-	-	-
Shares and share-linked instruments ⁽⁷⁾	231,653	125,005	196,140	103,995
Deferred remuneration vested during the financial year⁽⁸⁾	27,572	67,410	24,630	31,298
Deferred remuneration adjustments during the financial year				
Reductions due to ex post explicit adjustments ⁽⁹⁾	(2,778)	(1,050)	(150)	-
Reductions due to ex post implicit adjustments	-	-	(3)	-

As set out below, no senior managers were awarded a guaranteed or sign-on award for the financial year ended 31 March 2021 (FY2020: Nil). One material risk taker was awarded a guaranteed award and a sign-on award during FY2021 (FY2020: Nil). No termination payments were made to a senior manager during FY2021 (FY2020: 1 related to unused leave entitlements associated with termination). No termination payments were made to a material risk taker during FY2021 (FY2020: Nil).

\$A'000	Senior managers				Material risk takers			
	No. of individuals		Total amount		No. of individuals		Total amount	
	2021	2020	2021	2020	2021	2020	2021	2020
Sign-on awards ⁽¹⁰⁾	-	-	-	-	1	-	17	-
Guaranteed profit share ⁽¹⁰⁾	-	-	-	-	1	-	61	-
Termination payments ⁽¹¹⁾	-	1	-	188	-	-	-	-

Notes to the quantitative remuneration disclosures

- (1) Remuneration awarded in respect of FY2021 and FY2020 performance reflects remuneration relating to services to MBL for the portion of the relevant periods that each individual was a senior manager or material risk taker of MBL.
- (2) Fixed remuneration comprises current year salary, including superannuation and other cash allowances.
- (3) Variable remuneration awarded in respect of performance for FY2021 and FY2020 includes the total value of non-deferred and deferred components related to the FY2021 and FY2020 awards. The non-deferred (cash-based) components will be granted and paid in the following financial year and the payment of deferred components are deferred to a future period.
- (4) Includes the value of retained profit share invested in MGL ordinary shares under the MEREP, retained profit share notionally invested in Macquarie managed-fund equity under the DPS Plan, and for senior managers, PSUs.
- (5) This relates to EU Material Risk Takers in the UK for whom a portion of their non-deferred profit share is delivered in MGL ordinary shares in accordance with the Remuneration Code.
- (6) Value as at 31 March 2021 and 31 March 2020 of unvested deferred remuneration.
- (7) Includes the value as at 31 March 2021 (for FY2021) and 31 March 2020 (for FY2020) of retained profit share invested in MGL ordinary shares under the MEREP, retained profit share notionally invested in Macquarie managed-fund equity under the DPS Plan, and for senior managers, the fair value of PSUs at the same date. The value of retained profit share invested in the MEREP for FY2021 has been calculated based on the 31 March 2021 share price of \$A152.83. For FY2020, the value of retained profit share invested in the MEREP has been calculated based on the 31 March 2020 share price of \$A85.75.
- (8) Value as at the date of vesting of deferred remuneration that vested during the financial years ended 31 March 2021 and 31 March 2020 for senior managers and material risk takers. The value has been calculated based on the share price on the date of vesting which for FY2021 was in the range of \$102.20 to \$141.17 (FY2020: \$ A119.93 to \$ A134.60).
- (9) Explicit adjustments include any realised reductions relating to forfeitures, lapses as a result of failure to meet performance hurdles, and adjustments made to deferred remuneration under the Malus and Post Employment Event provisions.
- (10) These amounts reflects sign-on and minimum conditional profit share awards granted during FY2021 excluding buy-outs with respect to annual incentives forgone from their previous employers on appointment to Macquarie. Relevant amounts relating to the minimum conditional profit share award for FY2021 and buy-out awards are also included in the tables under 5.1 and 5.2 respectively.
- (11) This amount reflects payments made FY2020 associated with termination of employment with Macquarie Group in accordance with Macquarie Group policies, Executive Director remuneration arrangements, individual employment agreements, and/or local legal requirements. Payments associated with termination will typically include unused long-service and annual leave entitlements, and redundancy amounts, where applicable, but will exclude the release (in accordance with Macquarie Group's remuneration arrangements) of deferred remuneration awarded in prior years which is included in deferred remuneration vested during the relevant financial year. There are no ex-gratia termination payments. Individuals may also retain deferred remuneration held in the MEREP, the DPS Plan or as PSUs (senior managers only), which may be released in future years subject to the relevant restriction periods, DPS release provisions and performance hurdles per Macquarie Group policies, Executive Director remuneration arrangements and/or individual employment agreements.

Appendix 4 List of APRA Quantitative Tables

APS 330 Table	Title	Section No
Attachment A	Common Disclosures Template	Appendix 1
Attachment D		
6 (b) to (f)	Risk Weighted Assets (RWA)	4.3
6 (g)	Capital Ratios	4.3
7 (b)	Macquarie's Credit Risk Exposures	5.3
7 (c)	Credit Risk by Geographic Distribution	5.4
7 (d)	Credit Risk Distribution by Counterparty Type	5.5
7 (e)	Credit Risk by Maturity Profile	5.6
7 (f)	Provisions by Counterparty Type	5.3 & 7.4
7 (g)	Provisions by Geographic Region	7.5
7 (h)	Movement in Provisions	7.7
7 (i)	Credit Risk Exposures by Measurement Approach	5.3 & 6.1
7 (j)	General Reserve for Credit Losses	7.6
8 (b)	Credit Risk Exposures by Risk Weight	6.2
9 (d)	Credit Risk Exposures by Risk Grade	6.3
9 (e)	Provisions by Counterparty Type	7.4
9 (f)	Analysis of Expected Credit Model Performance versus Actual Results	7.8
10 (b) & (c)	Exposures Mitigated by Eligible Collateral	8.2
11 (b)	Credit Equivalent Amounts for Counterparty Exposures	8.3
11 (c)	Notional Amount of Credit Derivatives	8.3
12 (g) & (o)	Originating ADI Securitisation Exposures	9.2.1
12 (h)	Performance of Assets Securitised	9.2.2
12 (i) & (p)	Summary of Outstanding Exposures Intended to be Securitised	9.2.3
12 (j), (q) & (r)	Securitisation Activity	9.2.4
12 (k) & (s)	Exposure by Type of Asset	9.3.1
12 (l)	Exposure by Risk Weight Band – Banking Book	9.3.2
12 (t)	Exposure by Risk Weight Band – Trading Book	9.3.2
12 (u)	RWA by Risk Weight Band – Trading Book	9.3.2
12 (n) & (w)	Re-securitisation Exposure	9.3.3
13 (b)	Debt Security Specific Risk Figures	12.2.3
14 (f)	Value at Risk Figures	12.2.1
14 (f)	Stressed Value at Risk Figures	12.2.2
16 (b) & (c)	Equity Investments	13.2
16 (d) & (e)	Gains and Losses on Equity Investments	13.4
16 (f)	Capital Requirements Arising from Equity Risks	13.3
17 (b)	Interest Rate Risk in the Banking Book	12.2.4
Attachment E		
18	Leverage Ratio Disclosure Template	15.1
19	Summary Comparison of Accounting Assets versus Leverage Ratio Exposure Measure	15.2
Attachment F		
20	Liquidity Coverage Ratio Disclosure Template	16.0
21	Net Stable Funding Ratio Disclosure Template	17.0

Appendix 5 Glossary of Terms

ADI	Authorised Deposit-taking Institution.
Additional Tier 1 Capital	A capital measure defined by APRA comprising high quality components of capital that satisfy the following essential characteristics: <ul style="list-style-type: none"> – provide a permanent and unrestricted commitment of funds; – are freely available to absorb losses; – rank behind the claims of depositors and other more senior creditors in the event of winding up of the issuer; and – provide for fully discretionary capital distributions.
Additional Tier 1 deductions	An amount deducted in determining Additional Tier 1 Capital, as defined in Prudential Standard APS 111 Capital Adequacy: Measurement of Capital.
ALA	Alternative Liquid Assets
AMA	Advanced Measurement Approach (for determining operational risk).
APRA	Australian Prudential Regulation Authority.
ADI Prudential Standards (APS)	APRA's ADI Prudential Standards. For more information refer to APRA website.
Associates	Associates are entities over which Macquarie has significant influence, but not control. Investments in associates may be further classified as Held for Sale ('HFS') associates. HFS associates are those that have a high probability of being sold within 12 months to external parties. Associates that are not held for sale are carried at cost and equity-accounted. Macquarie's share of the investment's post-acquisition profits and losses is recognised in the income statement and its share of post-acquisition movements in reserves is recognised within equity.
ASF	Available Stable Funding
Bank Group	MBL and its subsidiaries.
Basel III IRB Formula	A formula to calculate RWA, as defined in Prudential Standard APS 113 – Capital Adequacy: Internal Ratings-based Approach to Credit risk.
BAC	Board Audit Committee.
BCN 2	BCN2 were issued by MBL in June 2020 and are quoted on the Australian Securities Exchange. The BCN2 pay discretionary, quarterly floating rate cash distributions equal to three month BBSW plus 4.70% per annum margin, adjusted for franking credits. These instruments are non-cumulative and unsecured and may be redeemed at face value on 21 December 2025, 21 June 2026 or 21 December 2026 (subject to certain conditions being satisfied) or earlier in specified circumstances. The BCN2 can be converted into a variable number of MGL ordinary shares (subject to certain conditions being satisfied) on these redemption dates; mandatorily exchanged on 21 December 2028; exchanged earlier upon an acquisition event (with the acquirer gaining control of MGL or MBL); or where APRA determines MBL would be non-viable without an exchange or a public sector injection of capital (or equivalent support).
BFS	Banking and Financial Services Group
The Board, Macquarie Bank Board	The Board of Voting Directors of Macquarie Bank Limited
BRC	Board Remuneration Committee
BRiC	Board Risk Committee
CA	Credit Assurance
CAF	Corporate and Asset Finance Group
CAGR	Compound Annual Growth Rate
CEO	Managing Director and Chief Executive Officer
CET1	Common Equity Tier 1 capital
CGM	Commodities and Global Markets Group
CFO	Chief Financial Officer
Contingent liabilities	Defined in AASB 137 Provisions, Contingent Liabilities and Contingent Assets as a possible obligation that arises from past events and whose existence will be confirmed only by the occurrence or non-occurrence of one or more uncertain future events not wholly within the control of the entity; or a present obligation that arises from past events but is not recognised because it is not probable to occur or the amount cannot be reliably measured.

Appendix 5 Glossary of Terms

continued

CCE	Current Credit Exposure. The sum of the positive mark-to-market value (or replacement cost) of market-related contracts entered into by the ADI.
CCR	Counterparty Credit Risk
CEA	Credit Equivalent Amount. The on-balance sheet equivalent value of an off balance sheet transaction.
Central counterparty	A clearing house or exchange that interposes itself between counterparties to contracts traded in one or more financial markets, becoming the buyer to every seller and the seller to every buyer, and therefore ensuring the future performance or open contracts.
CLF	Committed Liquidity Facility
Common Equity Tier 1 capital	A capital measure defined by APRA comprising the highest quality components of capital that fully satisfy all the following essential characteristics: <ul style="list-style-type: none"> – provide a permanent and unrestricted commitment of funds, – are freely available to absorb losses, – do not impose any unavoidable servicing charge against earnings; and – rank behind the claims of depositors and other creditors in the event of winding up. Common equity tier 1 capital comprises Paid Up Capital, Retained Earnings, and certain reserves.
Common Equity Tier 1 Capital Ratio	Common Equity Tier 1 Capital net of Common Equity Tier 1 deductions expressed as a percentage of RWA.
Common Equity Tier 1 deductions	An amount deducted in determining Common Equity Tier 1 Capital, as defined in Prudential Standard APS 111 Capital Adequacy: Measurement of Capital.
CRO	Chief Risk Officer
CVA	Credit Valuation Adjustment. The risk of mark-to-market losses on the expected counterparty risk to OTC derivatives.
Deconsolidated entities	Entities involved in conducting insurance, funds management and non-financial operations including special purpose vehicles (SPV) for which Macquarie has satisfied APS 120 Attachment A operational requirements for regulatory capital relief.
Directors' Profit Share (DPS)	The DPS plan comprises exposure to a notional portfolio of Macquarie-managed funds. Retained amounts for Executive Directors are notionally invested over the retention period. This investment is described as 'notional' because Executive Directors do not directly hold securities in relation to this investment. However, the value of the retained amounts will vary as if these amounts were directly invested in actual securities, giving the Executive Directors an effective economic exposure to the performance of the securities. If the notional investment results in a notional loss, this loss will be offset against any future notional income until the loss is completely offset.
DSR	Debt Specific Risk
DSU	Deferred Share Unit issued under the MEREP
DVP	Delivery versus Payment
EAD	Exposure at Default – the gross exposure under a facility (the amount that is legally owed to the ADI) upon default of an obligor.
ECAI	External Credit Assessment Institution.
ECAM	Economic Capital Adequacy Model.
EL	Expected Loss, which is a function of EAD, PD and LGD.
ELE	Extended Licensed Entity is an entity that is treated as part of the ADI ('Level 1') for the purpose of measuring the ADI's capital adequacy and exposures to related entities. The criterion for qualification as an ELE is detailed in the APRA Prudential Standards.
EMEA	Europe, Middle East & Africa.
ERL	Equity Risk Limit – Board imposed limit by which equity risk positions are managed.
ERBA	External Rating Based Approach
Executive Key Management Personnel (Executive KMP)	Members of Executive Committee of MBL
Executive Voting Director	An Executive Board Member
FIRB	Foundation Internal Ratings Based Approach (for determining credit risk)
GAAP	Generally Accepted Accounting Principles

GRCC	Group Risk and Compliance Committee
HQLA	High Quality Liquid Assets
ICAAP	Internal Capital Adequacy Assessment Process.
IRRBB	Interest Rate Risk in the Banking Book.
Impaired assets	An asset for which the ultimate collectability of principal and interest is compromised.
ISDA	International Swaps and Derivatives Association
LCR	Liquidity Coverage Ratio
Level 2 Regulatory Group	MBL, its parent Macquarie B.H. Pty Ltd and MBL's subsidiaries but excluding deconsolidated entities for APRA reporting purposes.
Level 3 Regulatory Group	MGL and its subsidiaries but excluding entities required to be deconsolidated for regulatory reporting purposes.
LGD	Loss given default is defined as the economic loss which arises upon default of the obligor.
LVR	Loan to Value Ratio
Macquarie	Level 2 regulatory group
Macquarie Income Securities (MIS)	MIS were repaid on 15 April 2020, followed by a redemption on 16 April 2020. MIS were a perpetual instrument with no ordinary equity conversion rights. MIS were listed for trading on the Australian Stock Exchange (now known as the Australian Securities Exchange) in 1999. MIS distributions were paid quarterly at a floating rate of BBSW plus 1.7% per annum and payment was subject to certain conditions including profitability of the Bank. MIS were included in Additional Tier 1 capital under Basel III transitional rules.
Macquarie Group	MGL and its subsidiaries
Malus	The discretion of the Board (from 2012) to reduce or eliminate unvested profit share amounts where it determines that an employee's action or inaction has caused the Macquarie Group significant reputational harm, caused a significant or unexpected financial loss or caused the Macquarie Group to make a material financial restatement.
MACS	On 8 March 2017, MBL, acting through its London Branch, issued \$US750 million of Macquarie Additional Capital Securities (MACS). MACS are subordinated, unsecured notes that pay discretionary, non-cumulative, semi-annual fixed rate cash distributions. Subject to certain conditions the MACS may be redeemed on 8 March 2027, or each fifth anniversary thereafter. MACS can be exchanged for a variable number of fully paid MGL ordinary shares on an acquisition event (with the acquirer gaining control of MGL or MBL), where MBL's common equity Tier 1 capital ratio falls below 5.125%, or where APRA determines MBL would be non-viable without an exchange or a public sector injection of capital (or equivalent support).
MAM	Macquarie Asset Management Group
MBL	Macquarie Bank Limited ABN 46 008 583 542
MBL Consolidated Group	MBL and its subsidiaries
MEREP	Macquarie Group Employee Retained Equity Plan
MFHPL	Macquarie Financial Holdings Pty Limited
MGL	Macquarie Group Limited ABN 94 122 169 279
NCO	Net Cash Outflows
Non-Bank Group	MGL, MFHPL and its subsidiaries
NPAT	Net Profit after Tax
NSFR	Net Stable Funding Ratio
Operating Group	The Operating Groups consist of MAM, CAF, CGM, BFS and Macquarie Capital
ORMF	Operational Risk Management Framework
PCE, PFCE	Potential Credit Exposure (PCE) / Potential Future Credit Exposure (PFCE). The potential exposures arising on a transaction calculated as the notional principal amount multiplied by a credit conversion factor specified by APRA.
PD	Probability of Default. The likelihood of an obligor not satisfying its financial obligations.
Post-2009 DPS	Retained directors' profit share which is deferred to future periods and held as a notional investment in Macquarie managed-fund equity.

Appendix 5 Glossary of Terms

continued

PSU	Performance Share Unit issued under the MEREP
Reserve Bank of Australia (RBA)	Central bank of Australia with responsibility over monetary policy.
Risk-weighted assets (RWA)	A risk-based measure of an entity's exposures, which is used in assessing its overall capital adequacy.
RAS	Risk Appetite Statement
RMG	Risk Management Group
ROE	Return on Ordinary Equity
RSF	Required Stable Funding
RSU	Restricted Share Unit issued under the MEREP
RMBS	Residential Mortgage Backed Securities
Senior Executive	Macquarie Group's combined Division Director and Executive Director population.
Senior Management	Members of Macquarie Group's Executive Committee and Executive Directors who have significant management or risk responsibility in the organisation.
SFA	Supervisory Formula Approach
SFT	Securities Financing Transactions (SFT). SFTs are transactions such as repurchase agreements, reverse repurchase agreements and security lending and borrowing, where the value of the transactions depends on market valuations and the transactions are often subject to margin agreements.
SME	Small – Medium Enterprises
SPV's	Special purpose vehicles or securitisation vehicles.
Subordinated debt	Debt issued by Macquarie for which agreements between Macquarie and the lenders provide, in the event of liquidation, that the entitlement of such lenders to repayment of the principal sum and interest thereon is and shall at all times be and remain subordinated to the rights of all other present and future creditors of Macquarie. Subordinated debt is classified as liabilities in the Macquarie financial report and may be included in Tier 2 Capital.
Tier 1 Capital	Tier 1 capital comprises of (i) Common Equity Tier 1 Capital; and (ii) Additional Tier 1 Capital
Tier 1 Capital Deductions	Tier 1 capital deductions comprises of (i) Common Equity Tier 1 Capital deductions; and (ii) Additional Tier 1 Capital deductions.
Tier 1 Capital Ratio	Tier 1 Capital net of Tier 1 Capital Deductions expressed as a percentage of RWA.
Tier 2 Capital	A capital measure defined by APRA, comprising other components of capital which contribute to the strength of the entity.
Tier 2 Capital Deductions	An amount deducted in Tier 2 Capital, as defined in Prudential Standard APS 111 Capital Adequacy: Measurement of Capital.
Total Capital	Tier 1 Capital plus Tier 2 Capital less Total Capital Deductions.
Total Capital Ratio	Total Capital expressed as a percentage of RWA.
TSR	Total Shareholder Return
VaR	Value-at-Risk

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