



Nottingham Building Society

Pillar 3 Disclosures

31 December 2015

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1. Overview

1.1 Background

The Basel Committee on Banking Supervision (BCBS) introduced the Basel II framework (Basel II) which was implemented in the EU at the beginning of 2007.

On 1 January 2014, the Basel Committee replaced the Basel II framework with the Capital Requirements Regulation (CRR) and Capital Requirements Directive (CRD), commonly known as the Capital Requirements Directive IV (CRD IV), introducing a revised definition of capital resources and included additional capital and disclosure requirements. The rules are enforced in the UK by the Prudential Regulatory Authority (PRA).

On 28 January 2015, the BCBS issued revised Pillar 3 disclosure requirements which will take effect from year-end 2016. The revised requirements supersede the existing Pillar 3 disclosure requirements and will enable market participants to better compare banks' disclosure of risk-weighted assets.

The disclosure in this document meets the Society's obligation under Pillar 3 which applies to banks and building societies and complements the minimum capital requirements in Pillar 1 and the supervisory review process in Pillar 2. The Pillar 3 disclosures require firms to publish key information about their underlying risks, capital and risk management and are aimed at promoting market discipline.

1.2 Basis and Frequency of Disclosures

This document details The Nottingham's Pillar 3 disclosures as at 31 December 2015, with comparative figures for 31 December 2014 where relevant, and has been prepared to meet the disclosure requirements of CRD IV.

The Pillar 3 report is based upon the Society's Annual Report and Accounts for the year ended 31 December 2015, unless otherwise stated. Pillar 3 disclosures are issued on an annual basis in conjunction with the publication of the Annual Report and Accounts in accordance with regulatory guidelines.

1.3 Location and Verification

These disclosures and the Annual Report and Accounts are published on the Nottingham's website (www.thenottingham.com).

These disclosures have been reviewed by the Board Audit Committee and the Internal Audit function and approved by the Board. The disclosures are not subject to external audit; however, some of the information within the disclosures also appears in the Society's audited 2015 Annual Report and Accounts.

1. Overview

1.4 Scope of Application

The disclosure requirements in this document apply to Nottingham Building Society (“the Society”) only. For prudential purposes the Society is shown on an unconsolidated basis.

PRA number: 200785

The principal office of the Society is:

Nottingham House, 3 Fulforth Street, Nottingham NG1 3DL.

The trading subsidiaries of the Society, which are consolidated for financial statement purposes only, are:

Name of Subsidiary	Ownership	Nature of business
Harrison Murray Ltd	100%	Estate Agency
HM Lettings Ltd	100%	Lettings
Nottingham Mortgage Services Ltd	100%	Mortgage Broker
Nottingham Property Services Ltd	100%	Estate Agency

There are no current or foreseen material, practical or legal impediments to the prompt transfer of capital resources or repayment of liabilities among Nottingham Building Society and its subsidiaries.

1.5 Directors

A summary of the relevant experience of each of the Executive and Non-executive Directors is given on pages 18 and 19 of the 2015 Annual Report and Accounts.

Confirmation of directorships held is disclosed in the Annual Business Statement, which is available on page 92 of the 2015 Annual Report and Accounts.

The policy regarding recruitment and diversity for selection of Directors is outlined on page 28 of the 2015 Annual Report and Accounts.

A copy of the 2015 Annual Report and Accounts is available at www.thenottingham.com.

2. Risk management objectives & policies

2.1 Introduction

The Nottingham recognises risk as a natural consequence of its business environment, as with any organisation. Through prudent management it aims to manage risk in a manner that supports the achievement of its strategic objectives, whilst protecting members’ interests and its financial resources.

2.2 Risk Management Framework

The Board is responsible for ensuring that an effective framework is in place to promote and embed an effective risk-aware culture that identifies, appropriately mitigates and manages the risks which the Group and Society face in the course of delivering its strategic objectives.

This includes both current risks and those associated with the implementation of future strategy. The Board annually reviews and approves a risk appetite statement. In pursuing its strategy the Board ensures there are appropriate capabilities and resources available, along with sufficient capital strength to succeed. This includes focusing on risk and reward to ensure it is at an acceptable level.

The Nottingham operates a ‘three lines of defence’ approach to the allocation of responsibilities for risk identification and management. This is illustrated in the following diagram:

3 Lines of Defence	Focus	Summary of core responsibilities
1st line of defence: Front Line Function	Control	Day to day management and control of risk
2nd line of defence: Risk Management	Oversight	Oversight and challenge of first line of defence
3rd Line of defence: Internal Audit	Assurance	Independent assurance of the first two lines of defence.

2. Risk management objectives & policies

2.3 Organisation and Structure of Risk Management

The Nottingham’s risk committee structure has been designed to support a wide ranging approach to the identification and management of risk. In so doing each of the six ‘management level’ risk committees report to the Board Risk Committee, whose responsibility it is to take a Society wide view of The Nottingham’s overall exposure to risk.



The table below illustrates how The Nottingham’s committees fit into the three lines of defence framework:

Key Risks	First Line	Second Line	Third Line
Credit Risk			Board Risk Committee and Board Audit Committee
Retail Credit Risk (Residential and buy-to-let Mortgages)	Retail Lending	Retail Credit Committee	
Secured business lending Credit Risk (Commercial Mortgages)	Secured business lending	Retail Credit Committee	
Treasury Credit Risk	Treasury Risk	ALCO	
Liquidity & Funding Risk	Treasury Risk	ALCO	
Market Risk	Treasury Risk	ALCO	
Operational Risk (including Financial Crime and Project Risk)	All business areas	Operational Risk Committee	
Information Security Risk and Data Protection	All business areas	ISC	
Conduct Risk	All business areas	Conduct Risk Committee	
Project Delivery Risk	Programme office	Programme Board	

2. Risk management objectives & policies

Detailed below are the board and management level risk committees along with a summary of their respective remits:

Board Risk Committee (BRC)	
<i>Committee members</i>	All Board members
<i>Summary terms of reference</i>	<p>The BRC is responsible for overseeing the management of risk by ensuring:</p> <ol style="list-style-type: none"> Key risks are identified and steps taken to mitigate them. Due consideration is given to all significant matters relating to governance, control, regulatory and compliance issues. Key risk and controls are monitored adequately. Adequate capital is maintained for the Group's key risk exposures, both to ensure regulatory compliance and the achievement of its strategic goals. <p>It also oversees, at a high level, the operation of the Internal Capital Adequacy Assessment Process (ICAAP) and Individual Liquidity Adequacy Assessment (ILAA).</p> <p>In addition the BRC monitors The Nottingham's overall capital and liquidity adequacy and exposure to risk.</p>
<i>Frequency</i>	Quarterly

Board Audit Committee (BAC)	
<i>Committee members</i>	3 Non-executive Directors
<i>Summary terms of reference</i>	<p>The BAC considers all audit matters relating to The Nottingham, including systems of internal control, financial reporting, accounting policies and judgemental accounting issues.</p> <p>The BAC oversees the work of Internal Audit. This includes considering the findings from audit reports and reviewing the progress of management in implementing identified actions.</p> <p>The BAC considers the scope and planning of external audit activities and recommends to the Board any decisions on the engagement of external auditors for non-audit services.</p>
<i>Frequency</i>	Quarterly with additional meetings to deal with the interim financial statements and Annual Report and Accounts.

2. Risk management objectives & policies

Assets and Liabilities Committee (ALCO)	
<i>Committee members</i>	Chief Executive, Deputy Chief Executive & Finance Director, Head of Treasury Risk, Treasurer, Head of Finance and Head of Risk.
<i>Summary terms of reference</i>	<p>The ALCO assists the Board and Executive in the prudent management of The Nottingham's Treasury function. It is responsible for developing and defining the treasury risk appetite of The Nottingham and for ensuring that the activities of the Treasury function support the corporate plan whilst remaining compliant with all applicable regulatory requirements.</p> <p>It fulfils this role by ensuring that appropriate policies, strategies and processes exist for the management of The Nottingham's Treasury function. It receives regular reports on the activities and performance of The Nottingham's treasury function.</p>
<i>Frequency</i>	Monthly

Retail Credit Committee (RCC)	
<i>Committee members</i>	Deputy Chief Executive & Finance Director, Chief Operating Officer, Head of Risk, Head of Central Sales & Direct Operations and Senior Credit Risk Manager.
<i>Summary terms of reference</i>	<p>The RCC assists the Board and Executive in the identification and prudent management of the credit risks that are associated with The Nottingham's mortgage lending portfolios.</p> <p>The Committee performs this role through the implementation of agreed credit risk policies, strategies and processes in order to ensure that the impairment charges and capital utilisation are aligned with the Society's strategy, financial plan and ICAAP.</p> <p>The Committee ensures that the management of retail credit risk is consistent with the Retail Credit Risk Appetite Statement approved by the Board Risk Committee (BRC). The Committee also ensures the adequacy of the impairment and provision levels for the mortgage lending portfolio. The Committee owns the Society's Rating System together with the Standardised and Provisioning Models and must ensure that they remain fit for purpose.</p>
<i>Frequency</i>	Minimum 5 meetings per annum

2. Risk management objectives & policies

Operational Risk Committee (ORC)	
<i>Committee members</i>	Chief Operating Officer, Deputy Chief Executive & Finance Director, Head of Risk, Head of HR, Head of IT and Change, Head of Branch Network, Head of Central Sales & Direct Operations, Head of Marketing, Senior Manager Operational Risk and Head of Estate Agency
<i>Summary terms of reference</i>	The ORC oversees the identification and management of system, project and operational risk (including the risks associated with fraud and financial crime) and related compliance issues across the Society.
<i>Frequency</i>	Quarterly

Information Security Committee (ISC)	
<i>Committee members</i>	Chief Executive, Head of IT and Change, Head of Risk, IT & IS Risk Manager, Infrastructure Manager, IT Architect, Senior Operational Risk Manager and IT Security Manager.
<i>Summary terms of reference</i>	The ISC supports the board in ensuring the security of the Society's information is managed effectively. It performs this role through the approval of appropriate frameworks and policy and oversight of policy implementation.
<i>Frequency</i>	Minimum 6 meetings per annum

Conduct Risk Committee (CRC)	
<i>Committee members</i>	Chief Operating Officer, Head of Marketing, Head of Branch Network, Head of Central Sales & Direct Operations, Head of HR, Head of IT & Change, Head of Risk, Senior Manager Conduct Risk, Group Secretary, Group Lettings Controller and Head of Business Planning
<i>Summary terms of reference</i>	The CRC has responsibility for overseeing the manner in which The Nottingham conducts business ensuring it is conducted in a clear, transparent and fair manner, ensuring fair outcomes for customers and is compliant with conduct rules set by the Regulator.
<i>Frequency</i>	Minimum 4 meetings per annum

2. Risk management objectives & policies

Programme Board (PB)	
<i>Committee members</i>	Chief Executive, Deputy Chief Executive & Finance Director, Chief Operating Officer, Head of Risk, Head of IT & Change, Head of Finance and Head of HR.
<i>Summary terms of reference</i>	The Programme Board supports the Executive in ensuring the optimum use of the Society's resources when applied to managing the Building Society's strategic programme of projects. It performs this role through the approval and prioritisation of all requests to initiate or materially change a project and ensures their ongoing monitoring of status at a corporate level.
<i>Frequency</i>	Minimum quarterly

2.4 Risk strategy

The Nottingham's risk strategy reflects its committee structure. As such the Board approves the Board Risk Appetite Statement which contains both quantitative and qualitative risk measures. These statements are supported by a suite of risk metrics, limits and triggers designed to ensure The Nottingham stays within risk appetite.

Secondary, more granular, risk policies are approved by the relevant management level risk committee. These risk policies set out the key risks, how they are managed and incorporate further limits and triggers which are monitored by the individual management level risk committees.

In addition the third line of defence review the operation of controls during their assessments to provide assurance to the Board Risk Committee that controls are operating as expected or where weaknesses are identified to assist the strengthening of the risk management framework.

During 2015, the information received and considered by the risk committees provided reasonable assurance that during the year there were no material breaches of control or regulatory standards and that The Nottingham maintained an adequate system of internal control. Where weaknesses in controls are identified by the three lines of defence the Board monitor the steps taken to remedy the issues and to ensure that the Society responds to changing external threats and economic circumstances and to the changing regulatory environment.

2.5 Risk appetite

The Nottingham defines its overall appetite for risk in two ways:

1. Quantitatively, by outlining, in numerical and or financial terms, objective limits for risk taking (as described below);
2. Qualitatively, by outlining in non-numerical terms the basic principles that are adopted by The Nottingham when managing its exposure to risk.

2. Risk management objectives & policies

The Nottingham's strategic objectives and business plan, as approved by the Board, are aligned with its risk appetite. In so doing the risk appetite is consistent with the outcomes of these processes and has been designed to support both the maintenance of The Nottingham's financial position and the achievement of its strategic objectives.

Individual area risk appetites for capital, liquidity, conduct and profitability are cascaded from The Nottingham's overall risk appetite.

2.6 Stress testing and planning

The Nottingham uses stress testing and scenario planning to help inform management of the impact from high impact stress events. Stress testing forms an integral part of the corporate planning process to ensure The Nottingham remains within risk appetite and has sufficient capital and liquid resources to carry out its strategic objectives.

3. Capital resources

From the 1 January 2014, the Basel III regulations more commonly known as CRD IV, has become part of European law. One of the objectives of the new regulation is to improve the banking sector's ability to absorb shocks arising from financial and/or economic stress. This is to be achieved through increasing both the quality and quantity of regulatory capital firms will be required to hold.

The following table show the Nottingham's capital resources as at 31 December 2015 on a CRD IV basis.

	2015 CRD IV £m	2014 CRD IV £m
Common Equity Tier 1 Capital		
General Reserves	193.5	178.0
Available-for-sale reserve (AFS)	0.2	0.4
Regulatory deductions and adjustments	(12.7)	(6.2)
Total Common Equity Tier 1 Capital	181.0	172.2
Additional Tier 1 Capital		
Permanent interest bearing shares (PIBS)	16.7	19.1
Total Tier 1 Capital	197.7	191.3
Tier 2 Capital		
Collective provision	2.2	1.7
Total Tier 2 Capital	2.2	1.7
Total Capital	199.9	193.0
Risk weighted assets		
- Credit risk	1,094.1	1,058.7
- Operational risk	90.8	79.7
Total risk weighted assets (RWA)	1,184.9	1,138.4
Capital ratios (as a % of RWA)		
- Common equity tier 1 ratio	15.3%	15.1%
- Tier 1 ratio	16.7%	16.8%
- Total capital ratio	16.9%	17.0%

3. Capital resources

Common Equity Tier 1 capital

The available-for-sale reserve is included in regulatory capital under CRD IV.

Under the rules of CRD IV, intangible assets and deferred tax assets that rely on future profitability and that arise from temporary differences are deducted from capital.

The treatment of The Nottingham's investments in subsidiary undertakings have been reviewed in 2015 and are now also deducted from capital.

The Nottingham's CET1 capital is disclosed on an end-point basis as no transitional provisions apply to these items.

Additional Tier 1 capital

Under the CRD IV rules, PIBS no longer contribute towards Tier 1 capital due to their lack of loss absorbency features. They are subject to the transitional rules of CRD IV which allow the instrument to be grandfathered until December 2021.

Tier 2 capital

The Tier 2 capital includes collective impairment provisions.

3.1 Reconciliation of Regulatory Capital

A reconciliation of balance sheet capital to regulatory capital is presented below:

	2015 CRD IV Transitional £m	2015 CRD IV Final £m
Total equity attributable to members per the Statement of Financial Position	193.7	193.7
Adjustments for items not eligible for inclusion in Common Equity Tier 1 capital:		
- Qualifying holdings	(7.7)	(7.7)
- Intangible fixed assets	(3.0)	(3.0)
- Deductible deferred tax assets	(2.0)	(2.0)
Total adjustments to Common Equity Tier 1 Capital	(12.7)	(12.7)
Adjustments to Additional Tier 1 capital:		
- Amortisation of PIBS under transitional rules	16.7	-
Adjustments to Tier 2 capital:		
- Add back: Collective impairment	2.2	2.2
Regulatory Capital	199.9	183.2

4. Capital adequacy

4.1 Capital Management

The Nottingham's policy is to maintain a strong capital base to maintain member, creditor and market confidence and to sustain the future development of the business. The Board manages The Nottingham's capital and risk exposures to maintain capital in line with regulatory requirements. This is subject to regular stress tests to ensure The Nottingham maintains sufficient capital for future possible events.

As a mutual, The Nottingham has no outside shareholders to whom it needs to pay dividends. As such The Nottingham does not have to maximise profitability so long as it maintains an adequate capital position.

The Nottingham's capital requirements are also monitored by the Prudential Regulatory Authority (PRA).

The Board monitors The Nottingham's capital position with the aid of its Internal Capital Adequacy Assessment Process (ICAAP). This requires The Nottingham to assess its capital adequacy over a 3 year period and determine the level of capital it requires to support both current and future potential risks.

The Nottingham adopted the Standardised Approach to calculate its credit risk weightings from 1 January 2008. Internally The Nottingham operates a similar standard to the Internal Ratings Based (IRB) approach for its retail mortgages, the benefit of which is an enhanced risk management capability.

Under the Standardised Approach the level of capital required against a given level of exposure to credit risk is calculated as:

$$\text{Credit risk capital requirement} = \text{Exposure value} \times \text{Risk weighting}^* \times 8\%.$$

*The risk weighting applied will vary depending on whether the asset is retail or wholesale. For retail assets, variables such as loan to value and security will impact the risk weighting. Wholesale assets are dependent on counterparty, duration and credit rating.

The primary source for obtaining information on counterparties' creditworthiness is External Credit Assessment Institutions (ECAIs). Unrated counterparties may be approved by the Assets and Liabilities Committee (ALCO).

Credit ratings are reviewed regularly and a list of relevant changes provided to the monthly ALCO meeting. Consideration will be given to selling holdings where ratings fall below the minimum criteria for a counterparty. In addition to credit ratings, The Nottingham reviews the capital adequacy, assesses the financial performance, non-performing loans and any other risks associated with financial institutions.

4. Capital adequacy

4.2 Capital Requirements Summary

The Society's minimum capital requirement under Pillar 1 is the sum of the credit risk capital requirement and the operational risk capital requirement.

The following table shows the Society's overall minimum capital requirement as at 31 December 2015:

Capital requirements	31 December 2015 £m	31 December 2014 £m
Credit Risk		
- Loans and advances to customers	81.1	79.5
- Wholesale lending	1.1	2.1
- Other Items	3.0	3.3
Operational Risk	7.3	6.4
Minimum capital requirement	92.5	91.3
Capital resources (section 3)	199.9	193.0
Excess of own funds over minimum Pillar 1 capital requirement	107.4	101.7

4.3 Leverage Ratio

The CRD IV framework requires firms to calculate a simple, transparent, non-risk based leverage ratio that is supplementary measure to the risk-based capital requirements.

The ratio is defined as the Capital Measure divided by the Exposure Measure, with this ratio expressed as a percentage. The basis of calculation is the average of the three month-end leverage ratios over a quarter.

The capital measure for the leverage ratio is Tier 1 capital from the risk-based capital framework as defined in paragraphs 49 to 96 of the Basel III framework (see table in Section 3), taking account of the transitional arrangements.

The Exposure measure is the total on and off balance sheet exposures less the deductions applied to Tier 1 capital as per Basel III requirements. In January 2014 the Basel Committee on Banking Supervision (BCBS) published a revised definition for calculating the leverage ratio which requires off-balance sheet items e.g. commitments, to be converted into credit exposure equivalents through the use of credit conversion factors (CCFs) resulting in reduced exposure measure. Therefore, the table below shows Nottingham's leverage ratio according to this revised BCBS definition.

4. Capital adequacy

Leverage – Transitional rules	2015 £m	2014 £m
Total Tier 1 capital	197.7	191.3
Exposure:		
- Balance sheet exposure	3,319.1	3,266.9
- Netted Derivative adjustment	6.3	6.3
- Mortgage Pipeline	78.9	28.2
- Other committed facilities	382.7	223.4
- Tier 1 deductions	(12.7)	(6.2)
Leverage ratio exposure	3,774.3	3,518.6
Leverage ratio	5.2%	5.4%

Leverage – Final rules	2015 £m	2014 £m
Total Tier 1 capital	181.0	172.2
Exposure:		
- Balance sheet exposure	3,319.1	3,266.9
- Netted Derivative adjustment	6.3	6.3
- Mortgage Pipeline	78.9	28.2
- Other committed facilities	382.7	223.4
- Tier 1 deductions	(12.7)	(6.2)
Leverage ratio exposure	3,774.3	3,518.6
Leverage ratio	4.8%	4.9%

The basis of calculating the 2015 leverage ratios has been updated to reflect the latest interpretation of the guidance as follows:

- The increase in the value of other committed facilities reflects application of a 100% (2014: 50%) credit conversion factor as defined in the revised BCBS definition.

The BCBS will continue to test for a minimum requirement of 3% for the leverage ratio during the parallel run period (i.e. from 1 January 2013 to 1 January 2017).

At the 31 December the leverage ratio of The Nottingham was well above the 3% regulatory minimum at 5.2% based on the transitional rules. Upon full implementation of the CRD IV rules this will reduce to 4.8%, but still well above the 3% regulatory minimum.

The Nottingham will continue to operate at a level considerably in excess of the regulatory minimum.

5. Measurement of risk

5.1 Overview

The Nottingham aims to manage all the risks that arise from its operations. The main categories of risk in our business are credit, liquidity, market, conduct of business, operational, business, strategic, regulatory, concentration and pension scheme obligation risk.

5.2 Credit Risk

Credit risk is the risk that a financial loss arises from the failure of a customer or counterparty to meet their contractual obligations. The Nottingham manages the level of credit risk it undertakes by applying various control disciplines, the objectives of which are to maintain asset quality in line with the stated risk appetite.

As a building society this is most likely to arise through the inability of borrowers to repay their mortgage commitments (retail credit risk) or through the failure of a treasury counterparty or country (wholesale credit risk).

a) Lending and Business Decisions

The Nottingham uses application scorecards to help it assess whether mortgage applications fit within its appetite for credit risk. Once loan funds have been advanced, behavioural scorecards are used to review the ongoing risk profile of both the portfolios and individual customers. In addition, for residential and buy-to-let mortgages property values are updated on a quarterly basis.

Through the use of scorecards, The Nottingham is able to estimate the likely level of default, mortgage arrears, impairment charges and capital allocation.

If the scorecard decision is to accept, the mortgage application will be processed. Where applications are declined, applicants are given as much information as possible regarding the reason for the decision.

b) Pricing

Pricing models are utilised for all mortgage product launches. The models include expected loss estimates and capital utilisation enabling the calculation of a risk adjusted return on capital.

c) Concentration Risk

The design of retail products takes into account the overall mix of products to ensure that The Nottingham's exposure to market risk remains within permitted parameters.

5.2.1 Credit Risk: Loans and advances to customers

a) Retail Credit Risk

Exposure to retail credit risk is limited to the provision of loans secured on property within the UK. All mortgage loan applications are reviewed by an individual underwriter supported by the use of application scorecards and are assessed with reference to The Nottingham's retail credit risk appetite statement which is approved by the Board Risk Committee. Exposure to retail credit risk is carefully monitored by the Retail Credit Committee which reports to the Board Risk Committee. Responsibility for day to day management is delegated to the Head of Risk.

5. Measurement of risk

5.2.1 Credit Risk: Loans and advances to customers (continued)

b) Secured Business Lending Credit Risk

The Nottingham's secured business lending policy is used to manage the level of credit risk. Primarily, secured business lending loans are made available to Small and Medium sized Enterprises (SME market) for either owner occupied or investment property purposes. Loans are only granted against the 'bricks and mortar' value (i.e. loans are only provided for the purchase/ re-mortgaging of a property and not for working capital or machinery, etc.)

Secured business lending credit risk is monitored by the Retail Credit Committee with day to day management delegated to the Head of Risk.

The table below details the minimum credit risk capital requirement by standardised exposure class at 31 December 2015 broken down by exposure value.

Standardised exposure classes	31 December 2015		31 December 2014	
	Exposure Value £m	Capital Requirement £m	Exposure Value £m	Capital Requirement £m
Retail	15.7	0.9	19.4	1.2
Secured by Mortgages on Residential Property	2,692.5	75.4	2,605.5	73.0
Secured by Mortgages on Commercial Real Estate	71.5	4.4	73.3	4.5
Past Due Items	3.3	0.3	8.3	0.7
Other Loans	1.4	0.1	1.7	0.1
Total Loans and advances to customers	2,784.4	81.1	2,708.2	79.5

The following table shows the residual maturities of all Loans and Advances exposures as at 31 December 2015.

31 December 2015	<3 months £m	>3 months, but < 1 year £m	>1 year but < 5 years £m	>5 years £m	Total £m
Retail	-	-	0.1	15.6	15.7
Secured by Mortgages on Residential Property	1.4	8.2	84.3	2,598.6	2,692.5
Secured by Mortgages on Commercial Real Estate	0.1	0.3	3.6	67.5	71.5
Past Due Items	-	0.1	0.3	2.9	3.3
Other Loans	0.1	-	0.2	1.1	1.4
Total Loans and advances to customers	1.6	8.6	88.5	2,685.7	2,784.4

5. Measurement of risk

5.2.1 Credit Risk: Loans and advances to customers (continued)

31 December 2014	<3 months £m	>3 months, but < 1 year £m	>1 year but < 5 years £m	>5 years £m	Total £m
Retail	-	-	0.3	19.1	19.4
Secured by Mortgages on Residential Property	2.3	7.5	86.2	2,509.5	2,605.5
Secured by Mortgages on Commercial Real Estate	0.2	0.1	3.6	69.4	73.3
Past Due Items	0.2	0.6	0.4	7.1	8.3
Other Loans	0.2	-	0.1	1.4	1.7
Total Loans and advances to customers	2.9	8.2	90.6	2,606.5	2,708.2

Credit risk exposures can be further sub-divided. The table below shows the geographical analysis of these exposures at 31 December 2015:

31 Dec 2015		Secured by Mortgages on Residential Property £m	Secured by Mortgages on Commercial Real Estate £m	Past Due Items £m	Other Loans £m	Total £m
Region (United Kingdom)	Retail £m					
Eastern	0.8	283.3	3.7	-	-	287.8
East Midlands	3.3	566.2	21.2	1.8	1.1	593.6
London	0.3	251.8	5.3	0.1	-	257.5
North East	1.5	108.0	0.9	-	-	110.4
North West	2.8	245.6	12.2	0.4	-	261.0
South East	0.9	392.2	6.0	0.2	-	399.3
South West	1.0	205.5	4.5	0.1	0.1	211.2
Wales	0.6	62.4	3.5	0.1	-	66.6
West Midlands	1.8	256.1	6.1	-	-	264.0
Yorkshire and Humberside	2.5	314.6	6.6	0.6	0.1	324.4
Other	0.2	6.8	1.5	-	0.1	8.6
Total	15.7	2,692.5	71.5	3.3	1.4	2,784.4

5. Measurement of risk

5.2.1 Credit Risk: Loans and advances to customers (continued)

31 Dec 2014						
Region (United Kingdom)	Retail £m	Secured by Mortgages on Residential Property £m	Secured by Mortgages on Commercial Real Estate £m	Past Due Items £m	Other Loans £m	Total £m
Eastern	0.7	286.2	4.0	-	-	290.9
East Midlands	5.1	549.3	21.8	4.3	1.2	581.7
London	0.3	295.9	4.5	0.4	-	301.1
North East	2.2	82.6	0.8	-	-	85.6
North West	2.2	214.2	12.3	0.9	-	229.6
South East	1.0	398.2	6.1	0.9	0.1	406.3
South West	0.9	203.5	4.7	0.1	0.1	209.3
Wales	0.7	60.0	3.7	0.1	-	64.5
West Midlands	3.3	229.3	6.4	0.6	-	239.6
Yorkshire and Humberside	2.7	278.3	7.2	1.0	0.1	289.3
Other	0.3	8.0	1.8	-	0.2	10.3
Total	19.4	2,605.5	73.3	8.3	1.7	2,708.2

5.2.2 Credit Risk: Wholesale Lending

A Board approved policy statement restricts the level of risk by placing limits on the amount of exposure that can be taken in relation to one counterparty or group of counterparties, and to industry sectors. This is reported by the Assets and Liabilities Committee to the Board Risk Committee.

The Nottingham's treasury policy only permits sterling denominated lending to UK and other central governments, UK local authorities, UK and overseas banks and building societies. During the year lending has been permitted to selected European based Multilateral Development Banks in instances where it qualifies as High Quality Liquid Assets (HQLA) eligible assets, The Nottingham has not permitted any lending directly to sovereign states, other than the UK. In addition, every bank must have a minimum 'A' rating from an external credit assessment institution and meet The Nottingham's thresholds on capital and non-performing loan measures.

The table below details the exposure value and minimum credit risk capital requirement by standardised exposure class at 31 December 2015.

Standardised exposure class	31 December 2015		31 December 2014	
	Exposure Value £m	Capital Requirement £m	Exposure Value £m	Capital Requirement £m
Central Government or Central Banks	402.1	-	352.4	-
Multilateral Development Banks	15.7	-	26.4	-
Institutions	54.9	1.1	111.5	2.1
Corporates	10.2	-	16.2	-
Total Wholesale lending	482.9	1.1	506.5	2.1

5. Measurement of risk

5.2.2 Credit Risk: Wholesale Lending (continued)

The following table shows the residual maturities of all Wholesale Credit exposures as at 31 December 2015.

31 December 2015	<3 months £m	>3 months, but < 1 year £m	>1 year but < 5 years £m	>5 years £m	Total £m
Central Government or Central Banks	371.4	10.4	20.3	-	402.1
Multilateral Development Banks	-	5.5	10.2	-	15.7
Institutions	17.5	15.8	21.6	-	54.9
Corporates	-	0.6	5.9	3.7	10.2
Total Wholesale lending	388.9	32.3	58.0	3.7	482.9

31 December 2014	<3 months £m	>3 months, but < 1 year £m	>1 year but < 5 years £m	>5 years £m	Total £m
Central Government or Central Banks	331.5	-	20.9	-	352.4
Multilateral Development Banks	-	-	26.4	-	26.4
Institutions	42.8	44.4	24.3	-	111.5
Corporates	3.3	3.3	6.6	3.0	16.2
Total Wholesale lending	377.6	47.7	78.2	3.0	506.5

The geographical split and credit rating of The Nottingham's treasury exposures at 31 December 2015 are detailed in the table below.

31 December 2015		UK £m	Supranational Institutions £m	North America £m	Asia £m	Total £m
Credit Rating Moody's	Fitch					
Aaa	AAA	-	15.7	-	-	15.7
Aa1	AA+	369.4	-	-	-	369.4
Aa2	AA	-	-	6.5	-	6.5
Aa3	AA-	-	-	13.6	8.9	22.5
A1	A+	15.1	-	-	-	15.1
A2	A	9.8	-	-	-	9.8
A3	A-	-	-	-	-	-
Baa1	BBB+	11.1	-	-	-	11.1
Unrated		32.8	-	-	-	32.8
Total		438.2	15.7	20.1	8.9	482.9

5. Measurement of risk

5.2.2 Credit Risk: Wholesale Lending (continued)

31 December 2014		UK	Supranational	North	Asia	Total
Credit Rating		£m	Institutions	America	£m	£m
Moody's	Fitch		£m	£m	£m	£m
Aaa	AAA	-	26.4	-	-	26.4
Aa1	AA+	352.3	-	-	-	352.3
Aa2	AA	-	-	6.5	-	6.5
Aa3	AA-	26.4	-	7.5	28.8	62.7
A1	A+	-	-	-	-	-
A2	A	35.2	-	-	-	35.2
A3	A-	-	-	7.3	-	7.3
Baa1	BBB+	8.1	-	-	-	8.1
Unrated		8.0	-	-	-	8.0
Total		430.0	26.4	21.3	28.8	506.5

The credit ratings of the external credit assessment institutions correspond to the following credit quality steps:

Credit Quality Step	Moody's	Fitch
1	Aaa to Aa3	AAA to AA-
2	A1 to A3	A+ to A-
3	Baa1 to Baa3	BBB+ to BBB-
4	Ba1 to Ba3	BB+ to BB-
5	B1 to B3	B+ to B-
6	Caa1 and below	CCC+ and below

5.3 Impairment Provisions

a) Impairment of Loans and advances to customers

Throughout the year, and at each year-end, individual assessments are made of all loans and advances against properties that are in possession or in arrears by two months or more and/or are subject to forbearance activities. Individual impairment provision is made against those loans and advances where there is objective evidence of impairment.

Objective evidence may include:

- Significant financial difficulty of the borrower/issuer;
- deterioration in payment status;
- renegotiation of the terms of an asset due to financial difficulty of the borrower or issuer, including granting a concession/forbearance to the borrower or issuer;
- becoming probable that the borrower or issuer will enter bankruptcy or other financial reorganisation; and
- any other information discovered during annual review suggesting that a loss is likely in the short to medium term.

5. Measurement of risk

If there is objective evidence of impairment, the amount of loss is measured as the difference between the assets carrying amount and the present value of estimated future cash flows discounted at the financial asset's original effective interest rate. In considering expected future cash flows, account is taken of any discount that may be needed against the value of the property at the balance sheet date thought necessary to achieve a sale and amounts recoverable under mortgage indemnity policies and anticipated realisation costs.

In addition, The Nottingham assesses quarterly whether there is objective evidence to suggest that a financial asset or group of financial assets is likely to be impaired. Where a collective assessment is made, each category or class of financial assets is split into groups of assets with similar credit risk characteristics. The Nottingham measures the amount of impairment loss by applying expected loss factors based on The Nottingham's experience of default, loss emergence periods, the effect of movements in house prices and any adjustment for the expected forced sales value.

The resultant impairment charge is deducted from the appropriate asset values in the balance sheet.

Details of past due loans and provisions for impaired exposure at 31 December 2015 are shown in the table below.

31 December 2015	Loans fully secured on residential property £m	Loans fully secured on land £m	Total £m
Not impaired			
Neither past due or impaired	2,702.8	66.0	2,768.8
Past due up to 3 months but not impaired	13.7	1.3	15.0
Past due over 3 months but not impaired	2.0	0.2	2.2
Possessions	-	0.5	0.5
Impaired			
Not past due	0.7	3.5	4.2
Up to 3 months	-	0.5	0.5
3 to 6 months	0.3	0.5	0.8
6 to 12 months	-	-	-
Over 12 months	0.1	-	0.1
Possessions	0.1	-	0.1
Total Exposure	2,719.7	72.5	2,792.2
Provision	1.1	3.4	4.5
Charge for the year	0.2	0.1	0.3

5. Measurement of risk

31 December 2014	Loans fully secured on residential property £m	Loans fully secured on land £m	Total £m
Not impaired			
Neither past due or impaired	2,613.2	68.3	2,681.5
Past due up to 3 months but not impaired	13.6	1.1	14.7
Past due over 3 months but not impaired	4.5	0.4	4.9
Possessions	-	0.4	0.4
Impaired			
Not past due	0.6	3.3	3.9
Up to 3 months	1.9	0.9	2.8
3 to 6 months	0.6	0.3	0.9
6 to 12 months	0.4	-	0.4
Over 12 months	0.2	-	0.2
Possessions	0.1	1.3	1.4
Total Exposure	2,635.1	76.0	2,711.1
Provision	0.9	3.9	4.8
Charge for the year	(0.1)	1.7	1.6

The values shown in the table relate to the full value of the loan, not just the amount past due. All past due and impaired loans are UK based.

The table below details the movement of impairment provisions during the year:

2015	Loans fully secured on residential property £m	Loans fully secured on land £m	Total £m
Individual provision			
At 1 January 2015	0.3	2.8	3.1
Provision for loan impairment	0.1	(0.3)	(0.2)
Provision utilised	-	(0.6)	(0.6)
At 31 December 2015	0.4	1.9	2.3
Collective provision			
At 1 January 2015	0.6	1.1	1.7
Provision for loan impairment	0.1	0.4	0.5
At 31 December 2015	0.7	1.5	2.2

5. Measurement of risk

2014	Loans fully secured on residential property £m	Loans fully secured on land £m	Total £m
Individual provision			
At 1 January 2014	0.8	1.5	2.3
Provision for loan impairment	(0.1)	1.6	1.5
Provision utilised	(0.4)	(0.3)	(0.7)
At 31 December 2014	0.3	2.8	3.1
Collective provision			
At 1 January 2014	0.6	1.0	1.6
Provision for loan impairment	-	0.1	0.1
At 31 December 2014	0.6	1.1	1.7

b) Impairment of Treasury Assets

The Nottingham assesses at each balance sheet date whether there is objective evidence that a financial asset or group of financial assets is impaired. Available-for-sale assets are impaired and impairment losses are incurred if there is objective evidence of impairment as a result of one or more events that occurred after the initial recognition of the asset (a 'loss event'), and that loss event has an impact on the estimated future cash flows of those assets. Loss events may include default of a counterparty or disappearance of an active market for the assets.

The amount of the impairment loss is recognised in the income statement. Any loss previously recognised through other comprehensive income is reversed out and charged to the income statement as part of the impairment cost.

During the year The Nottingham incurred no impairment charges on its treasury available for sale assets.

5.4 Credit risk mitigation

The Nottingham employs a range of techniques and strategies to reduce the credit risks of its retail and wholesale lending.

a) Loans and advances to customers

All mortgage loan applications are assessed with reference to the Nottingham's retail credit risk appetite statement and lending policy, which includes assessing applicants for potential fraud risk, and which is approved by the board.

For new customers the first element of the retail credit control framework is achieved via credit scoring, which assesses the credit quality of potential customers prior to making loan offers. The customers' credit score combines demographic and financial information. A second element is lending policy rules which are applied to new applications to ensure that they meet the risk appetite of the Nottingham. All mortgage applications are overseen by the Lending Services team who ensure that any additional lending criteria are applied and that all information submitted within the application is validated.

5. Measurement of risk

For existing customers who have been added to the lending portfolio, management use behavioural scorecards to review the ongoing creditworthiness of customers by determining the likelihood of them defaulting over a rolling 12 month period together with the amount of loss if they do default.

In the event of a default, the ultimate source of collateral remains the borrower's property. The Nottingham takes a first charge on all residential lending. The collateral is supported by an appropriate form of valuation using either an independent firm of valuers or an Automated Valuation Model (ALM).

The Nottingham insures its residential mortgage book against losses using Mortgage Indemnity Guarantee (MIG) Insurance. MIG Insurance is taken on all purchases where the loan to value (LTV) exceeds 80%. However, for prudence, no credit risk mitigation benefits have been taken from this purchase when assessing its Pillar 1 capital requirements.

The Nottingham does not have any exposure to the sub-prime market.

b) Treasury Assets

In addition to retail credit risks, The Nottingham is also exposed through its treasury function. This arises from counterparties who may be unable to repay loans and other financial instruments that the treasury team holds as part of its liquidity portfolio.

A regular assessment of investment quality is undertaken by the Treasury Risk team which is reported monthly to the Assets and Liabilities Committee (ALCO).

Instruments used for risk management purposes include derivative financial instruments (derivatives), which are contracts whose value is derived from one or more underlying price, rate or index inherent in the contract or agreement, such as interest rates, exchange rates or stock market indices.

The objective of The Nottingham in using derivatives is in accordance with the Building Societies Act 1986 and is to limit the extent to which The Nottingham will be affected by changes in interest rates. Derivatives are not used in trading activity or for speculative purposes.

The derivative instruments used by The Nottingham in managing its statement of financial position risk exposures are interest rate swaps. These are used to protect The Nottingham from exposures arising principally from fixed rate mortgage lending, fixed rate savings products and fixed rate wholesale funding. An interest rate swap is a contract to exchange one set of interest rate cash flows for another. Such swaps result in the economic exchange of interest rates. No exchange of principal takes place. Instead interest payments are based on notional principal amounts agreed at inception of the swap. The duration of the interest rate swap is generally short to medium term and their maturity profile reflects the nature of the exposures arising from the underlying business activities.

The Nottingham applies fair value hedging techniques to reduce its exposure to interest rate risk as follows:

Activity	Risk	Fair value interest rate hedge
Fixed rate mortgage	Increase in interest rates	Society pays fixed, receives variable
Fixed rate savings bond	Decrease in interest rates	Society receives fixed, pays variable
Fixed rate funding	Decrease in interest rates	Society receives fixed, pays variable

5. Measurement of risk

Under the new European Securities & Market Authority (ESMA) regulations it will become mandatory for all eligible derivative instrument transactions to be centrally cleared. Although not yet required The Nottingham has decided to centrally clear all eligible derivatives. As such all The Nottingham's derivatives are fully collateralised with a central clearing member.

The table below shows the derivative contracts held using the Mark to Market (MTM) method:

	Replacement Cost £m	Credit Exposure £m	Total Exposure £m
31 December 2015	3.7	6.4	10.1
31 December 2014	10.0	6.2	16.2

5.5 Liquidity Risk

Liquidity risk is the risk that The Nottingham will not have sufficient financial resources available to meet its obligations as they fall due, under either normal business conditions or a stressed environment.

It is The Nottingham's policy that a significant amount of its total assets are carried in the form of cash and other readily realisable assets in order to:

- Meet day-to-day business needs;
- Meet any unexpected cash needs;
- Maintain public confidence; and
- Ensure maturity mismatches are provided for.

Monitoring of liquidity and funding policies, in line with The Nottingham's prudent framework, is performed daily as set out by a Board approved policy statement. Compliance with these policies is reported, to the Assets and Liability Committee monthly and to the Board Risk Committee.

5.6 Market Risk

Market risk is the risk of changes to The Nottingham's financial condition caused by market variables in particular interest rates and property prices. Differing interest rate characteristics between assets and liabilities, and in particular fixed rate products, expose The Nottingham to the risk of either a reduction in interest income or an increase in interest expense relative to variable rate interest flows.

The instruments that are used for market risk management purposes include derivative financial instruments (derivatives). The objective of The Nottingham in using derivatives is in accordance with the Building Societies Act 1986 and is to limit the extent to which The Nottingham will be affected by changes in interest rates.

5. Measurement of risk

The treasury risk team is responsible for the day to day management of market risks. The balance sheet is subjected to a stress test of a 2% rise in interest rates on a weekly basis and the results are reported monthly to the Assets and Liabilities Committee. In addition management review interest rate basis risk, the risk that different market interest rates move by different amounts, to assess the possible impact on profit. Both sets of results are measured against risk appetite for market risk which is currently set at a maximum of 4.0% of capital.

The Nottingham’s sensitivity to this measurement (in terms of economic value) was:

	2% shift in interest rates £m	4.0% of capital £m
31 December 2015	(0.4)	8.0

A Board approved policy statement defines the maximum acceptable level of market risk as well as the steps that may be taken to reduce it. The Assets and Liabilities Committee is responsible for reviewing treasury activity, performance and compliance with approved policy statements. It reports to the Board Risk Committee.

5.7 Business Conduct Risk

Business conduct risk is the risk that The Nottingham does not conduct its business activities in a clear, transparent and fair manner. The Nottingham must ensure it complies with the FCA’s Principles of Business (PRIN).

Each business area is responsible for ensuring compliance with all regulatory and legal obligations with regard to conduct of business that affect its area of operations.

The Conduct Risk Committee, which comprises an executive director and senior managers, supports the Board Risk Committee by overseeing the manner in which The Nottingham conducts business with its members and customers.

It achieves this by ensuring effective governance and control frameworks are in place, maintained and monitored. In addition the committee will identify and drive actions to address priorities for improvement that will enable The Nottingham to deliver and sustain self-imposed targets in customer satisfaction and ensuring good customer outcomes.

5.8 Business Risk

Business risk is the risk of unexpected changes in the external environment that have the potential to affect The Nottingham’s business model either through the level of demand for The Nottingham’s products and services and or its ability to meet it.

The Nottingham looks to mitigate its exposure to business risk by having a diverse range of products and services so that its income source is not reliant on one product or one area of its business.

The Board monitors The Nottingham’s exposure to business risk. In so doing it receives a range of Management Information on a monthly basis from both the Deputy Chief Executive & Finance Director and Chief Operating Officer.

5. Measurement of risk

5.9 Strategic Risk

Strategic risk is the risk that the Nottingham pursues an inappropriate strategy or that risks associated with its implementation are not fully recognised. When discussing strategy the Board takes care to ensure that risks such as system changes, long term funding approach and acquisitions are evaluated and that management has plans to mitigate them.

The Board Risk Committee oversees the detailed evaluation of these risks.

5.10 Regulatory and Compliance Risk

These risks are the risk of loss from failure to comply with statutory and regulatory requirements. The Nottingham, being a retailer of mortgage, savings and insurance products, is regulated by the Prudential Regulatory Authority (PRA) and Financial Conduct Authority (FCA) and as such must comply with relevant policies.

The Nottingham must also comply with the relevant sections of the Building Society Act 1986 and other legal requirements.

Each business area is responsible for ensuring compliance with all regulatory and legal requirements that affect its area of operations. Oversight of the business is undertaken by the Compliance function supported by the Society's Secretary.

5.11 Concentration Risk

As a regional building society The Nottingham is exposed to concentration risk. This includes the potential for geographical and product concentrations in terms of both its mortgage book and wholesale funding activities.

a) Retail Credit Risk

The Nottingham has geographic concentration risk as it is regionally based in the East Midlands and domiciled in the UK, acquiring all of its current business from England and Wales.

Geographic concentration risk is monitored by observing the spread of The Nottingham's exposure by region and the impact of house price changes during various economic scenarios. The risk is monitored on an ongoing basis.

b) Wholesale Credit Risk

The Nottingham carries out wholesale lending predominantly in the London money markets. This creates a potential source of concentration risk if, for example, there is a general tightening of credit conditions.

5. Measurement of risk

Stress testing has been carried out to consider a systematic downgrading of all current non-UK government counterparties by one credit notch. This scenario is designed to mimic a general deterioration in the credit conditions in the UK money markets and recognises that there is concentration risk inherent within the wholesale lending function.

Funding concentration risk is mitigated by limiting the amount of exposure to each specific risk. Treasury monitors large exposures on a daily basis and reports any exceptions to policy to the ALCO on both a weekly and monthly basis. Limits are monitored on an ongoing basis and are formally reviewed twice a year as a minimum as part of the overall review of treasury policy.

5.12 Pension Scheme Obligation Risk

Pension liability risk is the risk that there may be a shortfall with respect to meeting the benefits that are due within a defined benefit pension scheme.

The Nottingham operates a contributory defined benefit pension scheme. The scheme closed to new members in 1997 and closed to future service accrual from 31 January 2009. The membership consists of pensioners, those with deferred benefits and current members.

The Nottingham is exposed to the risk that it will need to make further unexpected future contributions to the scheme. The risk may arise from a number of factors including:

- A fall in the discount rate increasing the present value of scheme liabilities.
- An increase in life expectancy increasing the present value of scheme liabilities.
- A fall in equity prices reducing the fair value of scheme assets.

The Nottingham uses independent actuarial advice to advise on the risks that may lead to an increase in the deficit. This is reviewed by the Board.

6. Measurement of operational risk capital

6.1 Operational Risk

Operational risk is the risk of loss arising from inadequate or failed internal processes, the actions of people, The Nottingham's systems or from external physical events such as wars, terrorism or an 'Act of God'.

All of The Nottingham's teams and functions are required to identify, assess, monitor and control their operational risks via an agreed framework and methodology. As part of the risk management framework all business areas are required to complete an Objectives, Risks and Control Assessment (ORCA) and review it on an annual basis. In addition line management are held directly responsible for the assessment and management of the operational risks and associated controls that fall within their area of responsibility.

The Operational Risk Committee, which comprises two executive directors and senior managers, oversees the management of operational risk. In so doing it monitors a range of management information and other reports on The Nottingham's operational risk exposures. It also reviews the results of the operational risk scenario analysis that is performed for the purposes of The Nottingham's Internal Capital Adequacy Assessment Process.

The Operational Risk Committee reports regularly to the Board Risk Committee that in turn reports to the Board.

6.2 Minimum Capital Requirements for Operational Risk

The Nottingham calculates its operational risk capital requirement using the Basic Indicator Approach. This is determined in relation to the Society's net income averaged over the previous 3 years.

The Nottingham's minimum (Pillar 1) capital requirement for operational risk at 31 December 2015 is:

	2015 Operational risk capital requirement £m	2014 Operational risk capital requirement £m
Basic Indicator approach	7.3	6.4

7. Asset encumbrance

In October 2013 the EBA published final draft implementing technical standards (ITS) on asset encumbrance reporting under Article 100 of Capital Requirements Regulation (CRR) which was adopted and published by the European Commission in December 2014. Article 100 of the CRR requires the institutions to report to the competent authorities the level of their repurchase agreements, securities lending and all forms of asset encumbrance.

From a legal perspective, asset encumbrance is a claim against a property by another party. From a financial perspective, such claims have traditionally taken the form of security interests, such as pledges, given on assets by a borrower to a lender. In other words, giving collateral encumbers assets.

The majority of Nottingham's encumbrance is driven by secured financing activities, which include transactions in repo and collateral swaps. The remaining encumbrance is driven by Hedging derivatives.

Assets

The tables below show components of our encumbered and unencumbered assets for the year ended 31 December 2015.

	Carrying amount of encumbered assets £m	Fair value of encumbered assets £m	Carrying amount of unencumbered assets £m	Fair value of unencumbered assets £m
Assets of the reporting institution	725.9	-	2,593.2	-
Debt securities	2.1	2.1	100.2	100.2
Other assets	723.8	-	2,493.0	-

Other assets include loans and advances (inc. mortgages) and other balance sheet items not listed above.

Collateral received

The EBA Guidelines allow competent authorities to waive the requirement to disclose template B subject to a firm meeting certain criteria. The Society meets the criteria and therefore Template B, Collateral received, is not disclosed.

Encumbered assets/collateral received and associated liabilities

	Matching liabilities, contingent liabilities or securities lent £m	Assets, collateral received and own debt securities issued other than covered bonds and ABSs encumbered £m
31 December 2015		
Carrying amount of selected financial liabilities	385.7	399.0

8. Remuneration committee and policy

The primary objective of the Committee is to make recommendations to the Board on the general remuneration policy of The Nottingham and specifically on the remuneration of Executive Directors. The Committee also has oversight of the remuneration of both the Society's senior management team and Remuneration Code staff.

From 1 January 2011, The Nottingham came within the scope of the Regulator's Remuneration Code (then the FSA). As a result those individuals who comprise Remuneration Code staff also fall within the remit of the Remuneration Committee.

The Committee comprises three non-executive directors (one of which acts as Chairman of the Committee) and the Chief Executive, the Head of HR and the Group Secretary attend.

Further details regarding the remuneration policy are set out in the Directors Remuneration Report in the 2015 Annual Report and Accounts which are published on The Nottingham's website www.thenottingham.com.

8.1 Code Staff

Code staff are defined by the Regulator as 'staff whose activities have a material impact on the firm's risk profile, this includes staff that perform significant influence functions, senior managers and risk takers'. This includes executive and non-executive directors.

The table below sets out the aggregate quantitative remuneration for code staff in relation to their services for The Nottingham for the year ended 31 December 2015.

	Number of staff	Fixed pay £000	Variable pay £000	Total £000	Proportion of variable to total pay %	Deferred variable pay £000
Senior Management	14	1,849	395	2,244	17.6%	133
Other code staff	2	163	9	172	5.2%	-
Non-Executive Directors	6	264	-	264	0%	-
Total	22	2,276	404	2,680	15.1%	133

Fixed Remuneration: Base salary, allowances, benefits and pension.

Variable pay: Annual bonus performance pay awards excluding any deferred element. The element subject to deferral is disclosed as variable pay in the year of payment.

Severance payments were made to two senior managers during 2015 totalling £75,000. A signing on payment of £5,000 was also paid to one senior manager in year.

No one individual has received remuneration of EUR1 million or more in 2015.

8. Remuneration committee and policy

8.2 Remuneration Policy:

Basic salary	Band, market benchmarking and performance driven. Band is determined via the HAY evaluation process and salaries for roles are determined by using functional external market benchmark data.
Variable pay	All code staff participate in one (Executive Directors participate in two) discretionary bonus schemes. The bonus schemes are based upon a modular scorecard approach derived from the Society's strategic goals which include effective risk management. As a mutual the Society does not issue shares on the Stock Exchange. For this reason the annual performance pay cannot be based upon Share Option Schemes or Share Incentive plans. The Society is a level three firm (as assets are less than £15bn) and is therefore not subject to the rules on retained shares and other instruments and deferral of variable pay.
Pensions	The Society contributes up to a maximum of 16% of salary (dependent upon age of joining and period of time in the scheme) for members of the Group Personal Pension Plan. The pension benefits relating to the Executive Directors are outlined in the 2015 Annual Report and Accounts.
Benefits	Include the provision of a car allowance, private medical insurance and death in service benefits.

9. Contacts

Should you have any queries regarding this document, please contact:

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Andy Lumby	Head of Finance
David Watts	Group Secretary

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10. Glossary

Arrears	A customer is in arrears when they are behind in meeting their contractual obligations with the result that an outstanding loan payment is overdue. The value of the arrears is the value of any payments that have been missed.
Additional Tier 1 capital (AT1)	Capital that meets certain rules under CRD IV and which comprises the Society's PIBS but only under the transitional provisions.
Basel II	Basel II is the second of the Basel Accords, issued by the Basel Committee on Banking Supervision, which defines the methods by which firms should calculate their regulatory capital requirements to retain sufficient capital to protect the financial system against unexpected losses. Basel II became law in the EU Capital Requirements Directive, and was implemented in the UK via the PRA/FCA Handbook.
Basel III	Basel III became effective in the UK on 1 January 2014 through CRD IV and sets out the details of strengthened global regulatory standards on bank capital adequacy and liquidity.
Capital Requirements Directive (CRD IV)	CRD IV is the European legislation which came into force from 1 January 2014 to implement Basel III. It is made up of the Capital Requirements Regulation (CRR) and the Capital Requirements Directive (CRD), outlining the capital requirements framework and introduced liquidity requirements, which regulators use when supervising firms.
Common Equity Tier 1 capital (CET1)	CET1 capital consists of internally generated capital generated from retained profits, other reserves less intangible assets and other regulatory deductions. CET1 capital is fully loss absorbing.
Common Equity Tier 1 ratio	Common Equity Tier 1 capital as a percentage of risk weighted assets.
Counterparty credit risk	Counterparty credit risk is the risk that the counterparty to a transaction could default before the final settlement of the transaction's cash flows.
Credit Quality Steps	A credit quality assessment scale as set out in CRR Articles 111 - 141 (Risk weights under the Standardised Approach to credit risk).
Credit risk	This is the risk that a customer or counterparty fails to meet their contractual obligations.
Debt securities	Assets representing certificates of indebtedness of credit institutions, public bodies or other undertakings excluding those issued by central banks.
Derivative financial instruments	A derivative financial instrument is a contract between two parties whose value is based on an underlying price or index rate it is linked to, such as interest rates, exchange rates or stock market indices. The Society uses derivative financial instruments to hedge its exposure to interest rates.
External Credit Assessment Institution (ECAI)	An ECAI (e.g. Moody's, Standard and Poor's, Fitch) is an institution that assigns credit ratings to issuers of certain types of debt obligations as well as the debt instruments themselves.
Fair value	Fair value is the amount for which an asset could be exchanged or a liability settled, between knowledgeable, willing parties in an arm's length transaction.

10. Glossary

Financial Conduct Authority (FCA)	The statutory body responsible for conduct of business regulation and supervision of UK authorised firms.
Impairment	The term impairment is usually associated with a long-lived asset that has a fair market value less than the historical cost (or book value) of the asset.
Impaired loans	Loans where there is objective evidence that an impairment event has occurred, meaning that the Society does not expect to collect all the contractual cash flows or expect to collect them later than they are contractually due. Impaired loans are defined as those which are more than three months in arrears or in possession. However other indicators of impairment may result in provisioning for losses.
Internal Capital Adequacy Assessment Process (ICAAP)	The Society's own assessment of the levels of capital that it needs to hold in respect of its regulatory capital requirements for risks it faces under a business as usual scenario including stress events.
Individual liquidity adequacy assessment (ILAA)	The Society's own assessment of the liquidity resources it requires in order to remain within the risk tolerances it has set. This will include an evaluation of potential stresses based on multiple market environments.
Institutions	Treasury assets with financial institutions such as banks and building societies.
Leverage Ratio	The ratio of Tier 1 capital divided by the total exposures which includes on and off balance sheet items.
Loan to value (LTV)	LTV expresses the amount of a mortgage as a percentage of the value of the property.
Market risk	The risk that movements in market risk factors, including foreign exchange rates, interest rates, credit spreads and customer-driven factors will create potential losses or decrease the value of the Society balance sheet.
Minimum capital requirement	The minimum amount of regulatory capital that a financial institution must hold to meet the Basel III Pillar 1 requirements for credit, market and operational risk.
Multilateral Development Banks	Treasury assets with Multilateral Development banks. These are also known as supranational institutions.
Operational risk	The risk of loss arising from inadequate or failed internal processes, people and systems, or from external events.
Other items	Other assets not included in other definitions.
Past due items	Loans which are 90 days or more in arrears.
Permanent interest bearing shares (PIBS)	Unsecured, deferred shares of the Society that are a form of Additional Tier 1 capital. PIBS rank behind the claims of all depositors, payables and investing members of the Society. PIBS are also known as subscribed capital.
Provisions	Amounts set aside to cover incurred losses associated with credit risks.
Prudential Regulation Authority (PRA)	The statutory body responsible for the prudential supervision of banks, building societies, insurers and small number of significant investment firms in the UK. The PRA is a subsidiary of the Bank of England.

10. Glossary

Retail	Residential mortgages where LTV is greater than 80%.
Risk appetite	The articulation of the level of risk that the Society is willing to accept (or not accept) in order to safeguard the interests of the Society's members whilst achieving business objectives.
Risk weighted assets (RWA)	The value of assets, after adjustment, under the relevant Basel III capital rules to reflect the degree of risk they represent.
Secured by Mortgages on Residential Property	Residential mortgages where LTV is less than or equal to 80%.
Secured by Mortgages on Commercial Real Estate	Secured business lending which is only made available to Small and Medium sized Enterprises.
Standardised Approach	The basic method used to calculate capital requirements for credit risk. In this approach the risk weighting used in the capital calculation are determined by specified percentages.
Tier 1 capital	A component of regulatory capital, it comprises CET1 and AT1.
Tier 2 capital	Comprises the collective impairment allowance (for exposures treated on a Standardised basis), less certain regulatory deductions.
Tier 1 ratio	Tier 1 capital as a percentage of risk weighted assets.